

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
FOI/PA# 1493849-000

Total Deleted Page(s) = 4
Page 13 ~ b6; b7C; b7D;
Page 14 ~ b6; b7C; b7D;
Page 15 ~ b6; b7C; b7D;
Page 16 ~ b6; b7C; b7D;

XXXXXXXXXXXXXXXXXXXXXXXXX
X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXXXXXX

UNITED STATES GOVERNMENT

Memorandum

FEDERAL GOVERNMENT

TO : Director,
Federal Bureau of Investigation

DATE: October 18, 1977

b6
b7C

Assistant Attorney General
Criminal Division

Taylor and Associates of Costa Rica: Possible violations 18 U.S.C.
871 et al.

The Overseas Private Investment Corporation (OPIC) has referred to the Department of Justice materials pertaining to possible violations of Federal law by Taylor and Associates of Costa Rica. Involved in this matter are statements and representations made by Taylor to OPIC in order to induce OPIC to extend to Taylor a combination of loans and debenture purchases totalling some \$1,500,000.

Included within the possible false statements and representations made by Taylor are statements as to the value and purchase price of various pieces of food (fruit and vegetable) processing machinery which were purchased by Taylor and which were pledged as security to OPIC in return for the loan in question.

In order to assist this Division to determine whether violations of Federal law have occurred, the Bureau is requested to interview

#34

EXP. PROC.
34 OCT 19 1977

b6
b7C
b7D

OCT 19 1977

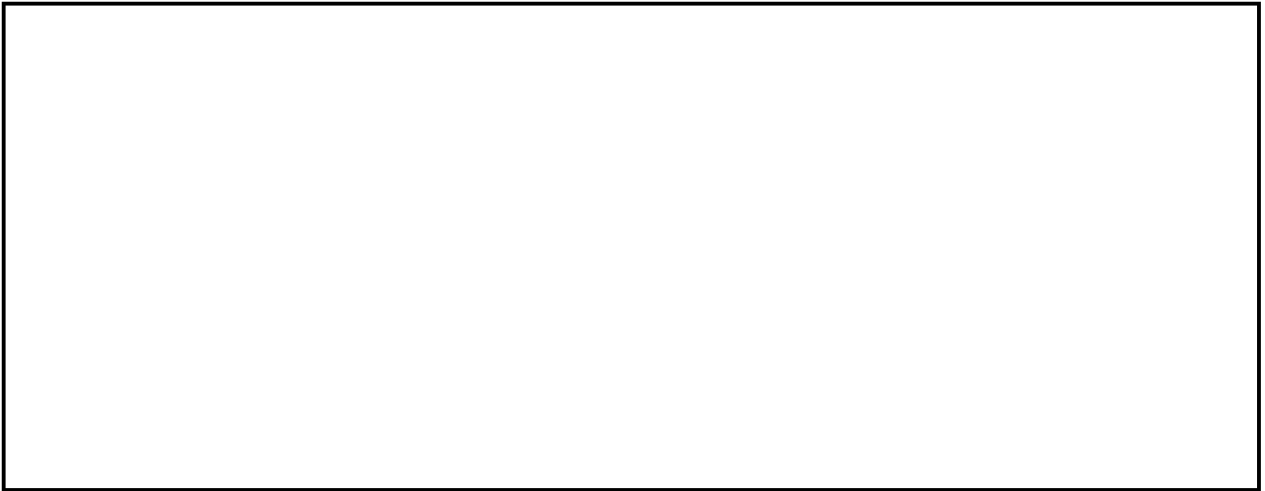
b6
b7C



NOV 4 1977

U.S. Savings Bonds Regularly on the Payroll Savings Plan

384



b6
b7C
b7D

Airtel

10/21/77

To: SAC, New Orleans (46-new)

1 -

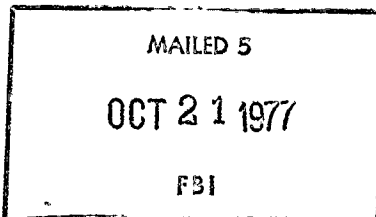
From: Director, FBI (46-new)

TAYLOR AND ASSOCIATES OF COSTA RICA,
FAG (OVERSEAS PRIVATE INVESTMENT CORPORATION)
OO: NO

Enclosed are two copies of a letter dated, 10/18/77,
from the Assistant Attorney General, Criminal Division to
the Director, FBI to locate and interview [redacted]
Last known address [redacted]

New Orleans is requested to promptly locate and
interview [redacted] and submit the results in LHM form
by cover airtel, four copies to the Bureau.

Enclosures - 2



ST-115
REC-79
DE-64

46-72563-2

23 OCT 26 1977

- Assoc. Dir. _____
- Dep. AD Adm. _____
- Dep. AD Inv. _____
- Asst. Dir.: _____
- Adm. Serv. _____
- Crim. Inv. _____
- Fin. & Pers. _____
- Ident. _____
- Intell. _____
- Laboratory _____
- Legal Coun. _____
- Plan. & Insp. _____
- Rec. Mgnt. _____
- Spec. Inv. _____
- Tech. Servs. _____
- Training _____
- Public Affs. Off. _____
- Telephone Rm. _____
- Director's Sec'y _____



NOV 4 1977

MAIL ROOM ☒

TELETYPE UNIT ☐

FBI

TRANSMIT VIA:

☐ Teletype
☐ Facsimile
☒ Airtel

PRECEDENCE:

☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:

☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ E F T O
☐ CLEAR

Date 11/8/77

TO: DIRECTOR, FBI

FROM: *Inf* SAC, NEW ORLEANS (46-3129)(RUC)

CHANGED

~~STAYLOR AND ASSOCIATES~~~~OF COSTA RICA;~~FAG (OVERSEAS PRIVATE
INVESTMENT CORPORATION) (A)

OO: Miami

Title marked changed to show Miami as office of origin; title previously carried New Orleans as office of origin.

Re Bureau airtel to New Orleans dated 10/21/77.

Enclosed for Miami are two copies of a letter dated 10/18/77, from the Assistant Attorney General, Criminal Division, to the Director of the FBI, to locate and interview

b6
b7Cb6
b7C
b7D

(2) - Bureau
 2 - Miami (Enc. 2)
 1 - New Orleans

(5)

21 NOV 11 1977

b6
b7C

50 DEC 1977

Approved: _____

Transmitted _____ (Number) (Time)

Per _____



UNITED STATES DEPARTMENT OF JUSTICE

FEDERAL BUREAU OF INVESTIGATION

In Reply, Please Refer to
File No.

46-4433

Miami, Florida
January 26, 1978

RE: TAYLOR AND ASSOCIATES
OF COSTA RICA
FRAUD AGAINST THE GOVERNMENT
(OVERSEAS PRIVATE INVESTMENT
CORPORATION)

[redacted] was inter-
viewed on November 22, 1977, at [redacted]
[redacted] telephone number [redacted]

b6
b7C
b7D

b6
b7C
b7D

This document contains neither recommendations
nor conclusions of the FBI. It is the property of the
FBI and is loaned to your agency; it and its contents are
not to be distributed outside your agency.

46-7513

ENCLOSURE



TELETYPE

PRIORITY

CLEAR

1/18/78

FM DIRECTOR, FBI (46-72565)

TO SAC, MIAMI PRIORITY

CLEAR

BT

TAYLOR AND ASSOCIATES OF COSTA RICA;

FAG (OVERSEAS PRIVATE INVESTMENT CORPORATION) OO: [REDACTED]

RENOAIRTEL TO THE BUREAU, NOVEMBER 8, 1977.

ON JANUARY 18, 1977, DEPARTMENTAL ATTORNEY [REDACTED]

TELEPHONICALLY INQUIRED OF RESULTS OF INTERVIEW WITH

[REDACTED] AS REQUESTED BY DEPARTMENT MEMORANDUM TO THE DIRECTOR DATED OCTOBER 18, 1977. IT IS NOTED THIS REQUEST FOR INVESTIGATION WAS FORWARDED TO NEW ORLEANS ON OCTOBER 21, 1977.

DEPARTMENT ATTORNEY [REDACTED] ADVISES RESULTS OF LEAD NECESSARY TO RESOLVE QUESTION CONCERNING POSSIBLE VIOLATION IN THIS MATTER.

MIAMI IMMEDIATELY ADVISE RESULTS OF EFFORTS TO LOCATE

[REDACTED] AND SUBMIT RESULTS OF LEAD AS REQUESTED BY

EXPEDITE COMMUNICATION.

EX-113

Assoc. Dir. BT

Dep. AD Adm.

Dep. AD Inv.

Asst. Dir.:

Adm. Serv.

Crim. Inv.

Fin. & Pers.

Ident.

Intell.

Laboratory

Legal Coun.

Plan. & Insp.

Rec. Mgmt.

Spec. Inv.

Tech. Servs.

Training

Public Affs. Off.

Telephone Rm.

Director's Sec'y

FEDERAL BUREAU OF INVESTIGATION SECTION
COMMUNICATIONS SECTION

JAN 18 1978

DCS 010

TELETYPE

REC-13

SEE NOTE PAGE 2

7 JAN 19 1978

58 FEB 2 1978

382
54 FEB 1978
MAIL ROOM ☐

Teletype

FBI/DOJ

CLEAR PAGE TWO

NOTE: Department Attorney [redacted] telephonically contacted [redacted] on 1/18/78, concerning results of investigation. He advised Section Chief [redacted] had requested that I be contacted for the purpose of expediting the results in the lead of this request.

b6
b7C
b7D

Department Attorney [redacted] contacted 1/18/78, and advised [redacted] being located and he will be advised in the near future.

MM0861 0192104Z

RR HI

DE MM

R 192105Z JAN 78

FM MIAMI (46-4433) P

TO DIRECTOR (46-72565) ROUTINE

BT

CLEAR

TAYLOR AND ASSOCIATES OF COSTA RICA; FAG (OVERSEAS PRIVATE INVESTMENT CORPORATION) (A), OO: MIAMI.

RE BUREAU TELETYPE TO MIAMI DATED JANUARY 18, 1978.

Assoc. Dir. _____
Dep. AD Adm. _____
Dep. X _____
Asst. Dir. _____
Adm. S. _____
Crim. I. _____
Fin. & _____
Ident. _____
Intell. _____
Laboratory _____
Legal Coun. _____
Plan. & Insp. _____
Rec. Mgnt. _____
Spec. Inv. _____
Tech. Serv. _____
Training _____
Public Affs. Off. _____
Telephone Rm. _____
Dir. _____

b6
b7C

b6
b7C
b7D

MIAMI WILL PROMPTLY ADVISE BUREAU OF INTERVIEW RESULTS AND
SUBMIT SUCH SUITABLE FOR DISSEMINATION.

BT

REC-54

EX-111

46-72565-5
6 JAN 23 1978

b6
b7C

50-200 1978

FBI

TRANSMIT VIA:

☐ Teletype
☐ Facsimile
☐ Airtel

PRECEDENCE:

☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:

☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ E F T O
☐ CLEAR

Date 1/26/78

TO: DIRECTOR, FBI (46-72565)

FROM: SAC, MIAMI (46-4433) (C)

SUBJECT: TAYLOR AND ASSOCIATES
OF COSTA RICA
FAG (OVERSEAS PRIVATE
INVESTMENT CORP.) (A)

(OO: MIAMI)

Re New Orleans airtel to Miami, 11/8/77; Bureau teletype to Miami, 1/18/78; and Miami teletype to Bureau, 1/19/78.

Enclosed for the Bureau are six copies of an LHM reflecting interview of [REDACTED]

b6
b7C
b7D

No further investigation is being conducted by Miami.

② - Bureau (Enc. 6)
 1 - Miami

EX-11

REC-20

46-72565-6

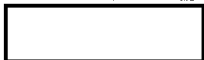
6 FEB 6 1978

b6
b7C

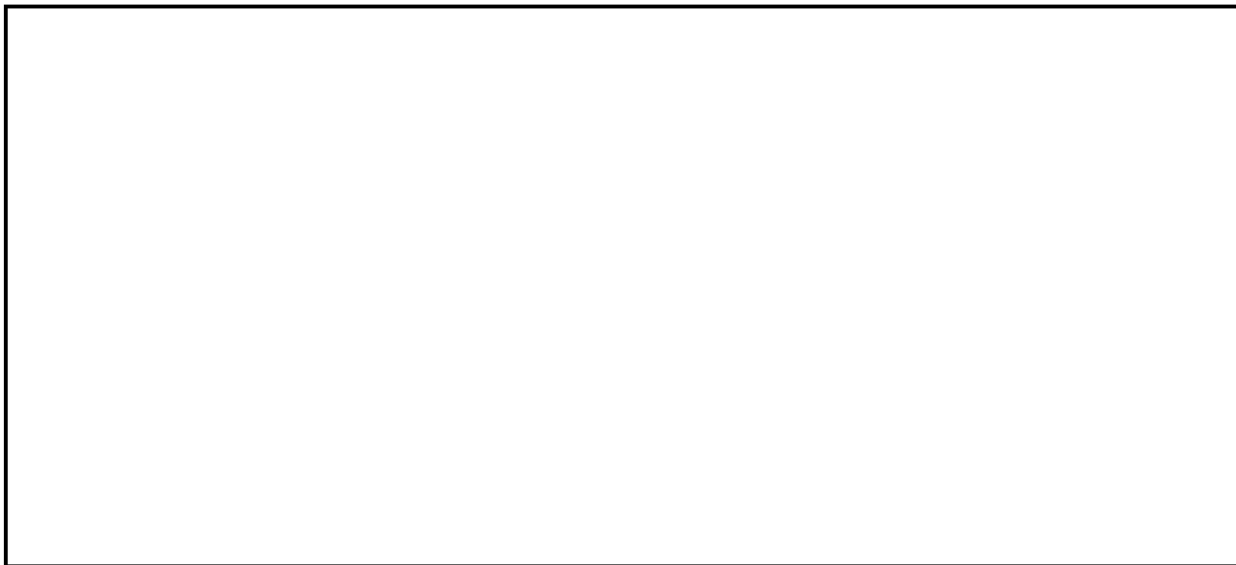
Transmitted _____
 (Number) (Time)

Per _____

NO 46-3129



b6
b7C



b6
b7C
b7D

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
FOI/PA# 1493849-000

Total Deleted Page(s) = 1
Page 4 ~ Referral/Direct;

XXXXXXXXXXXXXXXXXXXXXXXXX
X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXXXXXX

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE

Date: 07/23/1999

To: Chicago

Attn: Rockford RA

SA [REDACTED]

b6
b7C

From: Tampa

Squad 3

Contact: I.A. [REDACTED]

x8082

b6
b7C

Approved By: [REDACTED]

Drafted By: [REDACTED]

Case ID #: 196D-CG-110210

196B-TP-27022

b3
b6
b7C
b7E

Title: [REDACTED]

WF; MF;

Synopsis: Provide requested documents.

Reference: 196D-CG-110210 Serial 3

Administrative: Re Chicago EC to Miami dated 6/16/99.

Enclosures: Enclosed for Chicago are the following:

(1) Copy of Tampa file [REDACTED]

(2) Copy of Tampa file 196B-TP-27022 ser 1,2,3,4,5, and 8.

b3
b7E

Details: Referenced Chicago file requested copies of pertinent serials in Tampa file 196B-TP-27022 and serial 4 in Tampa file [REDACTED]

The requested serials are enclosed for the Chicago Division. Prosecution of [REDACTED] was declined by the USA in October 1992 because no proof existed of a Federal violation.

b6
b7C

No investigation remains in the Tampa regarding referenced Chicago EC.

♦♦

196B-TP-27022-9



U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No.

Post Office Box 172177
Tampa, Florida 33672-0177

March 5, 1993



INTER-CONTINENTAL DEVELOPMENT
GROUP, INC. (ICDG),
SARASOTA, FLORIDA;
OVERSEAS PRIVATE INVESTMENT
CORPORATION (OPIC),
WASHINGTON, D.C., - POSSIBLE VICTIM;
POSSIBLE FBW;
MF;

b6
b7C

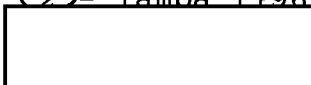
Investigation in captioned matter was predicated upon receipt on August 20, 1992 of a referral from the Fraud Section, Criminal Division of the United States Department of Justice (DOJ). In the referral, DOJ advised on June 18, 1992, the Fraud Section received information from OPIC, Office of General Counsel to the effect that an unknown person or persons had circulated a letter, which purported to be on OPIC letterhead, representing that the agency had issued financial guarantees or benefits to the ITCG of Sarasota, Florida. In fact, according to the General Counsel, OPIC had not issued such benefits; moreover, the agency has specifically informed ICDG that OPIC would not issue a benefit to the group. The information provided by OPIC seems to indicate that someone may be using the fraudulent letter in an attempt to misrepresent the financial condition of ICDG.

OPIC is an agency of the federal government which provides political risk investment insurance to Americans investing in foreign ventures.

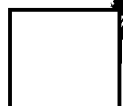
Routine records checks and utility checks failed to locate any address information for ICDG in Sarasota, Florida. Contact with OPIC on August 25, 1992, revealed ICDG was last known to be located at 2201 Cantu Court, Suite 200, Sarasota, Florida.

6 - Bureau

② - Tampa (196B-TP-27022)



SEARCHED
INDEXED
SERIALIZED
FILED



b6
b7C

[redacted]

b6
b7C

In addition, OPIC forwarded a brief chronology of correspondence regarding ICDG/OPIC. Also enclosed were copies of relevant documents and forms. A review of the OPIC correspondence and documents revealed the following information:

On February 5, 1992, [redacted] former member of OPIC's Board of Directors and attorney for ICDG, faxed to [redacted] OPIC's Insurance Officer, a copy of ICDG's request for registration for political risk investment insurance and asked her for ICDG's OPIC registration number. [redacted] wrote a note on the fax cover sheet from [redacted] that during a telephone conversation with [redacted] she advised OPIC can do commercial buildings but not the management of those buildings. [redacted] confirmed that ICDG would be involved in the management of the buildings as well. [redacted] OPIC's Central Records Officer, wrote another note on the fax cover sheet noting that she called the registration number to [redacted] ICDG was assigned OPIC number 181-92-018.

b6
b7C

b6
b7C

The request for registration by ICDG was dated January 32, 1992 (sic) and signed by [redacted]
[redacted]

b6
b7C

On February 6, 1992, [redacted] OPIC's Management Director of Insurance, initialed a deposition of request for registration approving ICDG for registration. On February 10, 1992 [redacted] faxed to [redacted] who was listed as ICDG's Chief Executive Officer, ten pages of documents. The fax confirmation sheet indicated faxed registration letter and form 52. On the same date, [redacted] wrote a standard registration letter to [redacted] informing him that OPIC had registered the project and explained the insurance application procedure. The letter emphasized the registration does not constitute a commitment by OPIC to insure the project.

b6
b7C

On March 2, 1992, an unknown OPIC officer made handwritten notes of a telephone conversation with [redacted] who was not interested in insurance but instead was looking for OPIC financing. [redacted] was given the name of the OPIC Finance Investment Officer and also noted that efforts were being made to obtain financing with the Polish-American Enterprise Fund.

b6
b7C

[redacted] faxed a note to [redacted] informing them of ICDG's OPIC registration number on April 11, 1992. On May 6, 1992, [redacted] wrote [redacted] OPIC Finance Officer,

b6
b7C

[redacted]

b6
b7C

requesting a "Performance Bond" for \$2,878,881.80. In the letter, [redacted] claimed that [redacted] had spoken to [redacted] previously about said bond. The letter also mentioned a signed contractual agreement. [redacted] on May 14, 1992, wrote to [redacted] attaching a letter which [redacted] requested that he fax to [redacted]. The second letter from [redacted] to [redacted] mentions [redacted] letter to [redacted] dated May 6, 1992, and reminds [redacted] that OPIC does not provide performance bonds but can insure them for certain circumstances. OPIC still has the original of that letter so it is presumed the letter was faxed to [redacted] and not mailed.

b6
b7C

b6
b7C

On June 15, 1992, [redacted] Agent for the Housing and Building Cooperative "Zrab" in Warsaw, Poland, writes to OPIC to verify the authenticity of a letter, dated May 20, 1992. The letter on OPIC letterhead was allegedly from [redacted] to [redacted]. The letter is in reference to a "performance bond" of the type that OPIC does not issue. The performance bond was in the amount of \$2,878,881.80. On June 16, 1992, [redacted] faxed to OPIC a copy of page 3 of a contract OPIC is familiar with and within the contract it refers to OPIC as the Overseas Protection Investment Corporation. A note at the bottom of the copy explains that this page is from one of ICDG's contracts in Poland for building houses and it is signed "Zrab". The following day, June 17, 1992, [redacted] writes to [redacted] insisting upon an explanation of the suspicious letter and a list of persons, organizations, and/or governmental agencies which have received the letter. [redacted] also insists that [redacted] explain why ICDG lists [redacted] as a member of this board when he is not. Finally, [redacted] withdraws legal representation from ICDG. On June 25, 1992, [redacted] is in telephonic contact with OPIC. [redacted] is in route to Poland. [redacted] is reminded during the conversation that OPIC does not issue performance bonds and requested to provide information regarding the May 20, 1992 letter. [redacted] does not respond. On the same date, [redacted] writes [redacted] to reiterate points made to [redacted] during two previous telephone conversations. The first point was that OPIC does not and has never issued performance bonds. Secondly, OPIC has no record of the letter to [redacted] dated May 20, 1992, purportedly on OPIC letterhead and purportedly signed by [redacted].

b6
b7C

b6
b7C

b6
b7C

Investigation at 2201 Cantu Court, Suite 200, revealed the location to be Executive Business Centers, Inc. (EBC), which is a shared service office leasing firm. Contact at EBC

b6
b7C

[redacted]

determined [redacted] leased office space at EBC and used the shared services to a large extent. [redacted] came to EBC in July 1990, and left in March 1992. [redacted] left owing over \$12,000.00 in overdue lease charges and shared services expenses. ICDG made extensive use of the fax and telephone facilities at EBC, but nothing since March 1992. The bulk of the faxes and telephone traffic was to Poland. While leasing space at EBC, [redacted] and his staff had numerous meetings with Polish representatives, who were allegedly negotiating with ICDG to construct low-cost housing in civic areas in Poland.

b6
b7C

Since ICDG "left in the night", numerous creditors and other inquires have been directed at EBC. EBC hired a collection agency to locate [redacted] but EBC believed [redacted] had left the country for Poland.

b6
b7C

Examination of the allegedly fraudulent OPIC letter, dated May 20, 1992, in which the issuance of a performance bond is discussed, revealed the fax numbers of OPIC and 1-813-747-4098. The indication is the letter was sent by fax from OPIC to the above number. The date of May 14, 1992, appears in the fax information line. Apparently, a legitimate fax information line was used in the fabrication of the May 20, 1992 letter. Since the legitimate fax of May 14, 1992 was addressed to [redacted] the logical assumption is that [redacted] prepared the fraudulent May 20, 1992 letter; however, no indication can be found on the letter to indicate it was actually sent out through the telephone wires as a fax. The receiving number was determined to be located at [redacted]. Investigation at the address determined [redacted] has four businesses located at the address. All the business names are variations of ICDG; however, [redacted] has not been seen in the building for several weeks.

b6
b7C

On October 20, 1992, the matter was discussed with the United States Attorney's Office (USAO), Middle District of Florida, Tampa, Florida. The consensus of opinion was [redacted]

b5

b6
b7C

[redacted]

On November 24, 1992, investigation at [redacted]
[redacted] revealed [redacted] has been abandoned inasmuch as
[redacted] is several months in arrears with his rental payments;
however, legal action has not yet been undertaken to reclaim the
premises by the building management. Efforts to locate [redacted]
at his last known address in December 1992 and January 1993 were
unproductive.

On February 12, 1993, a Special Agent (SA) of the
Federal Bureau of Investigation (FBI) from the New York office
advised [redacted] was apparently involved in a Bank
Fraud case, wherein a group of alleged investors from Ft.
Lauderdale, Florida, were attempting to float a \$200,000,000.00
loan to buy cigarettes for foreign distribution.

b6
b7C

FBI

TRANSMIT VIA:

☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:

☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:

☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 3/5/93

TO : DIRECTOR, FBI
 FROM : SAC, TAMPA (196B-TP-27022) (FMRA/S) (P)
 SUBJECT : "CHANGED"

[REDACTED]
 INTER-CONTINENTAL DEVELOPMENT GROUP, INC. (ICDG),
 SARASOTA, FLORIDA;
 OVERSEAS PRIVATE INVESTMENT CORPORATION (OPIC),
 WASHINGTON, D.C., - POSSIBLE VICTIM;
 POSSIBLE FBW;
 MF;
 (OO: TAMPA)

b6
b7C

Title marked "CHANGED" to set forth [REDACTED]
 [REDACTED] as subject in captioned matter. Title previously
 carried as "UNSUB(S); OVERSEAS PRIVATE INVESTMENT CORPORATION
 (OPIC); INTER-CONTINENTAL DEVELOPMENT GROUP; SARASOTA,
 FLORIDA - VICTIM; POSSIBLE FBW; MF; OO: TAMPA".

b6
b7C

Enclosed for FBIHQ is an original and five copies
 of an LHM suitable for dissemination.

3 - Bureau (Encs.6)
 2 - Tampa (Encs.2)



196B-TP-27022-4
 SEARCHED
 INDEXED
 SERIALIZED
 FILE

b6
b7C

1*

Approved: _____ Transmitted _____ Per _____
 (Number) (Time)

0004 MRI 01750

PE FB1TP

DE RUCNEB #0154 0720455

ZNR 00001

P 122128Z MAR 93

FM DIRECTOR FBI

TO FB TAMPA (P) PRIORITY

BT

BT

BT



b6
b7C

TAMPA PRIVATE INVESTMENT CORPORATION (TPI)

WILSON (GROUP), SARASOTA, FLORIDA - VICTIM;

TAMPA

TO TAMPA DATED 7/28/92, TELCALL BETWEEN SSA

[REDACTED] AND CRIMES SECTION, ECONOMIC CRIMES UNIT

b6
b7C

[REDACTED] ON 1/6/93.

TO REQUESTED AIRTEL AND PHONE CALL, OTHER

TO TAMPA BUT WERE NOT MEMORIALIZED. THESE

TO REQUESTED TAMPA TO PREPARE AN LHM SOITABLE

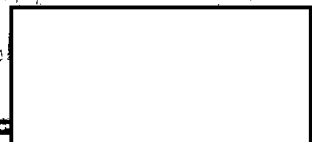
TO TAMPA DURING IN GAT CONDUCTED TO DATE IN

2-5



Pending

SERIAL



b6
b7C

PAGE TWO DE RUCNEB 0154 UNCLAS

THE CAPTIONED MATTER. THIS COMMUNICATION WAS REQUESTED BY THE DEPARTMENT OF JUSTICE. TO DATE, THE ECU HAS NOT RECEIVED THE COMMUNICATION. TAMPA IS REQUESTED TO EXPEDITIOUSLY PREPARE AN LHM, SUITABLE FOR DISSEMINATION, AND SEND THAT COMMUNICATION TO THE ECU, ROOM 4330, VIA OVERNIGHT MAIL. THIS COMMUNICATION SHOULD BE RECEIVED BY CLOSE OF BUSINESS WEDNESDAY, 3/17/93.

BT

#0154

END

93 MAR 19 1965

0004 MRI 01750

PP FBITP

DE RUCNFB #0154 0720455

ZNR UUUUU

P 122128Z MAR 93

FM DIRECTOR FBI

TO FBI TAMPA (196B)/PRIORITY/

BT

UNCLAS

CITE: //0621//

SUBJECT: UNSUBS; OVERSEAS PRIVATE INVESTMENT CORPORATION (OPIC)
INTERCONTINENTAL DEVELOPMENT GROUP; SARASOTA, FLORIDA - VICTIM;
POSSIBLE FBW; MF; OO: TAMPA.

REFERENCE AIRTEL TO TAMPA DATED 7/29/92, TELCALL BETWEEN SSA

WHITE-COLLAR CRIMES SECTION, ECONOMIC CRIMES UNIT

(ECU), AND SSRA	ON 1/6/93.
-----------------	------------

IN ADDITION TO REFERENCED AIRTEL AND PHONE CALL, OTHER
CONTACTS WERE MADE WITH TAMPA BUT WERE NOT MEMORIALIZED. THESE
CONTACTS WITH TAMPA REQUESTED TAMPA TO PREPARE AN LHM SUITABLE
FOR DISSEMINATION, EXPLAINING INVESTIGATION CONDUCTED TO DATE IN

b6
b7C

b6
b7C

Fl. Myers /

196B-TP-27022

CA

Pending

WORK COPY

1993

Fixed to Ft Myers + Sarasota RA's 3/12/12 = 7

PAGE TWO DE RUCNFB 0154 UNCLAS

THE CAPTIONED MATTER. THIS COMMUNICATION WAS REQUESTED BY THE DEPARTMENT OF JUSTICE. TO DATE, THE ECU HAS NOT RECEIVED THE COMMUNICATION. TAMPA IS REQUESTED TO EXPEDITIOUSLY PREPARE AN LHM, SUITABLE FOR DISSEMINATION, AND SEND THAT COMMUNICATION TO THE ECU, ROOM 4330, VIA OVERNIGHT MAIL. THIS COMMUNICATION SHOULD BE RECEIVED BY CLOSE OF BUSINESS WEDNESDAY, 3/17/93.

BT

#0154

NNNN

Memorandum



To : SAC, TAMPA (196B-TP-27022) (FMRA/S) (P) Date 12/27/93

From : SA [redacted]

Subject: [redacted]

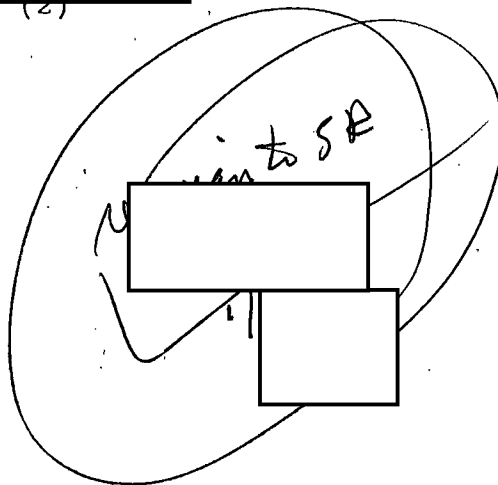
Sarasota, Florida
Overseas Private Investment Corporation
Washington, D.C. - Possible victim
Possible FBI; MIF (OO: TAMPA)

It is recommended captioned matter be
reassigned, in view of writer's imminent retirement.

2 - Tampa

(196B-TP-27022)

(2)



w/c to

1/3/94



196B-TP-27022-7

SEARCHED	INDEXED
SERIALIZED	FILED
DEC 27 1993	
FBI - TAMPA	

b6
b7C

b6
b7C

b6
b7C

b6
b7C

FBI

TRANSMIT VIA:

☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:

☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:

☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 2/23/94

TO : DIRECTOR, FBI
 (ATTN: ECONOMIC CRIMES UNIT)

FROM : SAC, TAMPA (196B-TP-27022) (FMRA/S) (C)

SUBJECT :

INTER-CONTINENTAL DEVELOPMENT
 GROUP, INCORPORATED (ICDG),
 SARASOTA, FLORIDA;
 OVERSEAS PRIVATE INVESTMENT
 CORPORATION (OPIC),
 WASHINGTON, D. C. - POSSIBLE VICTIM;
 POSSIBLE FRAUD BY WIRE;
 POSSIBLE MAIL FRAUD;
 (OO: TAMPA)

Reference Bureau airtel to Tampa dated July 29, 1992, with enclosure; Tampa airtel to Bureau dated March 5, 1993; and Bureau teletype to Tampa dated March 12, 1993.

Referenced airtel with enclosure requested an investigation into allegations that fraud offenses had been committed against the OVERSEAS PRIVATE INVESTMENT CORPORATION (OPIC).

An investigation by the FBI focused on
 INTER-CONTINENTAL
 DEVELOPMENT GROUP, INCORPORATED (ICDG), Sarasota, Florida.
 Contact with OPIC on August 25, 1992, produced a Sarasota

2 - Bureau
 ① - Tampa

CLOSE #4
A 2/28/94

196B-TP-27022-8
 SEARCHED
 INDEXED
 SERIALIZED
 FILED

Approved: _____ Transmitted _____ Per _____
 (Number) (Time)

b6
b7C

b6
b7C

b6
b7C

b6
b7C

196B-TP-27022

address for ICDG and correspondence was subsequently forwarded to the FBI by OPIC, reflecting a chronology of correspondence regarding ICDG and OPIC and relevant documents and forms attendant thereto.

By airtel dated March 5, 1993, investigation conducted by the FBI, Sarasota, Florida, was forwarded to the Bureau, Attention ECU, via a five-page letterhead memorandum (LHM). In summary, a provable violation was found to exist only if an allegedly fraudulent OPIC letter bearing the date of May 20, 1992, was sent via facsimile. No indication could be found on the letter indicating it was sent via telephone wires as a facsimile. On October 20, 1992, this matter was presented to the UNITED STATES ATTORNEY'S OFFICE, Middle District of Florida, [REDACTED]

b5

[REDACTED] Investigation in November 1992 reflected that [REDACTED] had fled Sarasota in haste.

b6
b7C

On February 18, 1994, [REDACTED] Fraud Section, Criminal Division, was telephonically contacted by FBI Sarasota to determine the status of this matter. [REDACTED] advised she had no further input to offer. She was advised that an LHM suitable for dissemination had been furnished the Bureau on March 5, 1993.

b6
b7C

As no further investigation is deemed prudent, this matter is being closed by the Tampa Division.

AIRTEL

UNCLAS

7/29/92

Director, FBI

SAC, Tampa (196-0)

UNSUBS;

OVERSEAS PRIVATE INVESTMENT CORPORATION (OPIC);

INTERCONTINENTAL DEVELOPMENT GROUP;

SARASOTA, FLORIDA - VICTIM;

POSSIBLE FBW; MF;

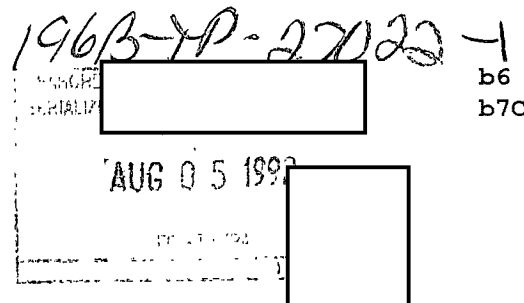
OO: TAMPA

Enclosed for Tampa is a letter received from Robert S. Mueller, III, Assistant Attorney General, Criminal Division, Department of Justice (DOJ) concerning a possible fraud committed against OPIC.

Tampa is requested to review the DOJ letter and conduct an appropriate investigation to determine if a Federal violation has occurred. If a violation has occurred, Tampa should handle the matter appropriately. Tampa should advise the DOJ and the White-Collar Crimes Section, Economic Crimes Unit, Room 5171, as to the results of the initial inquiry.

Enclosure

OKA



FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
FOI/PA# 1493849-000

Total Deleted Page(s) = 8

Page 3 ~ Referral/Direct;
Page 6 ~ Referral/Direct;
Page 7 ~ Referral/Direct;
Page 8 ~ Referral/Direct;
Page 9 ~ Referral/Direct;
Page 10 ~ Referral/Direct;
Page 11 ~ Referral/Direct;
Page 12 ~ Referral/Direct;

XXXXXXXXXXXXXXXXXXXXX
X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXX

December 23, 1992

[REDACTED]
Overseas Private Investment
Corporation
1100 New York Avenue, N.W.
Washington, D.C. 20527

Dear [REDACTED]

Your November 9th communication to Deputy Chief [REDACTED]
[REDACTED] Fraud Section, Department of Justice, has been
referred to the FBI.

A copy of your communication is being forwarded to
our Tampa Office for appropriate action. If you possess any
additional data concerning the matter you wrote about, please
furnish it to that Office located in Room 610, 500 Zack Street,
Tampa, Florida 33602, telephone number (813) 228-7661.

Sincerely yours,

[REDACTED] 71-2702-3
Deputy Assistant Director
Criminal Investigative Division

- Tampa (196B-TP-27022) - Enclosures (8)
Attention SAC: ReBuairtel 7/29/92 captioned, UNSUBS;
OVERSEAS PRIVATE INVESTMENT CORPORATION (OPIC);
INTERCONTINENTAL DEVELOPMENT GROUP; SARASOTA, FLORIDA -
VICTIM; POSSIBLE FBW; MF; OO: TAMPA. The attached
communication is being sent to your Office for
appropriate action. A summary LHM, in form suitable
for dissemination, should be sent to FBIHQ,
Attention: SSA [REDACTED] Economic Crimes Unit, CID, by
12/31/92.

[REDACTED] (Room 3012)
[REDACTED] (Room 4330) - Enclosures (4)
SEE NOTE PAGE TWO

DEC 24 1992
FBI
MAILED 33
Dep. Dir. _____
ADD Adm. _____
ADD Inv. _____
Asst. Dir.:
Adm. Servs. _____
Crim. Inv. _____
Ident. _____
Info. Mgnt. _____
Insp. _____
Intell. _____
Lab. _____
Legal Coun. _____
Tech. Servs. _____
Training _____
Cong. Affs. O. _____
Off. of EEO _____
Off. Liaison & _____
Int. Affs. _____
Off. of Public _____
Telephone Rm. _____

b6
b7C

[REDACTED]

NOTE: Correspondent sent a communication to Deputy Chief [REDACTED]
[REDACTED] Fraud Section, Criminal Division, DOJ. Robert S. Mueller, III, Assistant Attorney General, Criminal Division, forwarded this communication to the Director, FBI, by way of Memorandum dated 11/24/92, advising that his office had received the attached information concerning an apparently fraudulent letter written by someone purporting to be the President of the OVERSEAS PRIVATE INVESTMENT CORPORATION (OPIC). The Senior ~~Commercial Counsel of OPIC has advised that~~ [REDACTED] is not President of OPIC. The materials are forwarded for our consideration. Bufile 196B-TP-27022-1 shows a Memorandum dated 6/30/92 to the Director, FBI, from the Assistant Attorney General, Criminal Division. The subject: Referral from the OVERSEAS PRIVATE INVESTMENT CORPORATION (OPIC); ~~INTERCONTINENTAL DEVELOPMENT GROUP, SARASOTA, FLORIDA~~. The purpose of the memorandum was to request that the FBI open a criminal investigation into allegations that fraud offenses have been committed against OPIC and against certain business entities and individuals. On 6/18/92, the Fraud Section received information from OPIC's Office of General Counsel that a possible fraud was committed against OPIC by someone purportedly using OPIC letterhead representing that that agency had issued financial guarantees or benefits to INTERCONTINENTAL DEVELOPMENT GROUP. The AAG's memorandum was sent to the FBI with a request for an investigation and that copies of the results be furnished to the Fraud Section of the Criminal Division, DOJ, for review. By Airtel 7/29/92, Tampa was requested to review the DOJ letter and conduct an appropriate investigation to determine if a Federal violation had occurred. If a violation had occurred, Tampa was to handle the matter appropriately and was to advise the DOJ and the White-Collar Crimes Section, Economic Crimes Unit, as to the results of the initial inquiry. Reply was coordinated with SSA [REDACTED] Economic Crimes Unit, CID.

b6
b7C

b6
b7C

[REDACTED]

b6
b7C

On November 24, 1992, investigation at [REDACTED] revealed [REDACTED] has been abandoned inasmuch as [REDACTED] is several months in arrears with his rental payments; however, legal action has not yet been undertaken to reclaim the premises by the building management. Efforts to locate [REDACTED] at his last known address in December 1992 and January 1993 were unproductive.

b6
b7C

Recently uncovered information has revealed that [REDACTED] had notarized some of the documents that were transmitted to Polish authorities. Tampa will continue efforts to locate both [REDACTED] and will interview them concerning their involvement with OPIC and the Polish government as well as other aspects of this investigation.

b6
b7C

[REDACTED]

b6
b7C

In addition, OPIC forwarded a brief chronology of correspondence regarding ICDG/OPIC. Also enclosed were copies of relevant documents and forms. A review of the OPIC correspondence and documents revealed the following information:

On February 5, 1992, [REDACTED] former member of OPIC's Board of Directors and attorney for ICDG, faxed to [REDACTED] OPIC's Insurance Officer, a copy of ICDG's request for registration for political risk investment insurance and asked her for ICDG's OPIC registration number. [REDACTED] wrote a note on the fax cover sheet from [REDACTED] that during a telephone conversation with [REDACTED] she advised OPIC can do commercial buildings but not the management of those buildings. [REDACTED] confirmed that ICDG would be involved in the management of the buildings as well. [REDACTED] OPIC's Central Records Officer, wrote another note on the fax cover sheet noting that she called the registration number to [REDACTED] ICDG was assigned OPIC number 181-92-018.

b6
b7C

b6
b7C

The request for registration by ICDG was dated January 32, 1992 (sic) and signed by [REDACTED]

b6
b7C

On February 6, 1992, [REDACTED] OPIC's Management Director of Insurance, initialed a deposition of request for registration approving ICDG for registration. On February 10, 1992, [REDACTED] faxed to [REDACTED] who was listed as ICDG's Chief Executive Officer, ten pages of documents. The fax confirmation sheet indicated faxed registration letter and form 52. On the same date, [REDACTED] wrote a standard registration letter to [REDACTED] informing him that OPIC had registered the project and explained the insurance application procedure. The letter emphasized the registration does not constitute a commitment by OPIC to insure the project.

b6
b7C

On March 2, 1992, an unknown OPIC officer made handwritten notes of a telephone conversation with [REDACTED] who was not interested in insurance but instead was looking for OPIC financing. [REDACTED] was given the name of the OPIC Finance Investment Officer and also noted that efforts were being made to obtain financing with the Polish-American Enterprise Fund.

b6
b7C

[REDACTED] faxed a note to [REDACTED] informing them of ICDG's OPIC registration number on April 11, 1992. On May 6, 1992, [REDACTED] wrote [REDACTED] OPIC Finance Officer,

b6
b7C

b6
b7C

[redacted]

requesting a "Performance Bond" for \$2,878,881.80. In the letter, [redacted] claimed that [redacted] had spoken to [redacted] previously about said bond. The letter also mentioned a signed contractual agreement. [redacted] on May 14, 1992, wrote to [redacted] attaching a letter which [redacted] requested that he fax to [redacted]. The second letter from [redacted] to [redacted] mentions [redacted] letter to [redacted] dated May 6, 1992, and reminds [redacted] that OPIC does not provide performance bonds but can insure them for certain circumstances. OPIC still has the original of that letter so it is presumed the letter was faxed to [redacted] and not mailed.

b6
b7C

On June 15, 1992, [redacted] Agent for the Housing and Building Cooperative "Zrab" in Warsaw, Poland, writes to OPIC to verify the authenticity of a letter, dated May 20, 1992. The letter on OPIC letterhead was allegedly from [redacted] to [redacted]. The letter is in reference to a "performance bond" of the type that OPIC does not issue. The performance bond was in the amount of \$2,878,881.80. On June 16, 1992, [redacted] faxed to OPIC a copy of page 3 of a contract OPIC is familiar with and within the contract it refers to OPIC as the Overseas Protection Investment Corporation. A note at the bottom of the copy explains that this page is from one of ICDG's contracts in Poland for building houses and it is signed "Zrab". The following day, June 17, 1992, [redacted] writes to [redacted] insisting upon an explanation of the suspicious letter and a list of persons, organizations, and/or governmental agencies which have received the letter. [redacted] also insists that [redacted] explain why ICDG lists [redacted] as a member of this board when he is not. Finally, [redacted] withdraws legal representation from ICDG. On June 25, 1992, [redacted] is in telephonic contact with OPIC. [redacted] is in route to Poland. [redacted] is reminded during the conversation that OPIC does not issue performance bonds and requested to provide information regarding the May 20, 1992 letter. [redacted] does not respond. On the same date, [redacted] writes [redacted] to reiterate points made to [redacted] during two previous telephone conversations. The first point was that OPIC does not and has never issued performance bonds. Secondly, OPIC has no record of the letter to [redacted] dated May 20, 1992, purportedly on OPIC letterhead and purportedly signed by [redacted].

b6
b7C

b6
b7C

b6
b7C

Investigation at 2201 Cantu Court, Suite 200, revealed the location to be Executive Business Centers, Inc. (EBC), which is a shared service office leasing firm. Contact at EBC

b6
b7C

[redacted]

determined [redacted] leased office space at EBC and used the shared services to a large extent. [redacted] came to EBC in July 1990, and left in March 1992. [redacted] left owing over \$12,000.00 in overdue lease charges and shared services expenses. ICDG made extensive use of the fax and telephone facilities at EBC, but nothing since March 1992. The bulk of the faxes and telephone traffic was to Poland. While leasing space at EBC [redacted] and his staff had numerous meetings with Polish representatives, who were allegedly negotiating with ICDG to construct low-cost housing in civic areas in Poland.

b6
b7C

Since ICDG "left in the night", numerous creditors and other inquires have been directed at EBC. EBC hired a collection agency to locate [redacted] but EBC believed [redacted] had left the country for Poland.

b6
b7C

Examination of the allegedly fraudulent OPIC letter, dated May 20, 1992, in which the issuance of a performance bond is discussed, revealed the fax numbers of OPIC and 1-813-747-4098. The indication is the letter was sent by fax from OPIC to the above number. The date of May 14, 1992, appears in the fax information line. Apparently, a legitimate fax information line was used in the fabrication of the May 20, 1992 letter. Since the legitimate fax of May 14, 1992 was addressed to [redacted] the logical assumption is that [redacted] prepared the fraudulent May 20, 1992 letter; however, no indication can be found on the letter to indicate it was actually sent out through the telephone wires as a fax. The receiving number was determined to be located at 1401 Manatee Avenue, Bradenton, Florida. Investigation at the address determined [redacted] has four businesses located at the address. All the business names are variations of ICDG; however, [redacted] has not been seen in the building for several weeks.

b6
b7C

On October 20, 1992, the matter was discussed with the United States Attorney's Office (USAO), Middle District of Florida, Tampa, Florida. The consensus of opinion [redacted]

[redacted]

b5



U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No.

Post Office Box 172177
Tampa, Florida 33672-0177

March 5, 1993

[REDACTED]

INTER-CONTINENTAL DEVELOPMENT
GROUP, INC. (ICDG),
SARASOTA, FLORIDA;
OVERSEAS PRIVATE INVESTMENT
CORPORATION (OPIC),
WASHINGTON, D.C., - POSSIBLE VICTIM;
POSSIBLE FBW;
MF;

b6
b7c

Investigation in captioned matter was predicated upon receipt on August 20, 1992 of a referral from the Fraud Section, Criminal Division of the United States Department of Justice (DOJ). In the referral, DOJ advised on June 18, 1992, the Fraud Section received information from OPIC, Office of General Counsel to the effect that an unknown person or persons had circulated a letter, which purported to be on OPIC letterhead, representing that the agency had issued financial guarantees or benefits to the ITCG of Sarasota, Florida. In fact, according to the General Counsel, OPIC had not issued such benefits; moreover, the agency has specifically informed ICDG that OPIC would not issue a benefit to the group. The information provided by OPIC seems to indicate that someone may be using the fraudulent letter in an attempt to misrepresent the financial condition of ICDG.

OPIC is an agency of the federal government which provides political risk investment insurance to Americans investing in foreign ventures.

Routine records checks and utility checks failed to locate any address information for ICDG in Sarasota, Florida. Contact with OPIC on August 25, 1992, revealed ICDG was last known to be located at 2201 Cantu Court, Suite 200, Sarasota, Florida.

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
FOI/PA# 1493849-000

Total Deleted Page(s) = 12

Page 1 ~ b3; b5; b6; b7C; b7E;
Page 2 ~ b3; b5; b6; b7C; b7E;
Page 3 ~ b3; b5; b6; b7C; b7E;
Page 4 ~ b3; b5; b6; b7C; b7E;
Page 5 ~ b3; b5; b6; b7C; b7E;
Page 6 ~ b3; b5; b6; b7C; b7E;
Page 7 ~ b3; b5; b6; b7C; b7E;
Page 8 ~ b3; b5; b6; b7C; b7E;
Page 9 ~ b3; b5; b6; b7C; b7E;
Page 10 ~ b3; b5; b6; b7C; b7E;
Page 11 ~ b3; b5; b6; b7C; b7E;
Page 12 ~ b3; b5; b6; b7C; b7E;

XXXXXXXXXXXXXXXXXXXXXXXXX
X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXXXXXX

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
FOI/PA# 1493849-000

Total Deleted Page(s) = 21

Page 7 ~ b6; b7C; b7D;
Page 8 ~ b6; b7C; b7D;
Page 12 ~ Duplicate;
Page 13 ~ Duplicate;
Page 14 ~ Duplicate;
Page 23 ~ Duplicate;
Page 24 ~ Duplicate;
Page 25 ~ Referral/Direct;
Page 26 ~ Referral/Direct;
Page 27 ~ Referral/Direct;
Page 28 ~ Referral/Direct;
Page 29 ~ Referral/Direct;
Page 30 ~ Referral/Direct;
Page 31 ~ Referral/Direct;
Page 32 ~ Referral/Direct;
Page 33 ~ Referral/Direct;
Page 34 ~ Referral/Direct;
Page 39 ~ Duplicate;
Page 40 ~ Duplicate;
Page 41 ~ Duplicate;
Page 42 ~ Duplicate;

XXXXXXXXXXXXXXXXXXXXXXXXX
X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXXXXXX

58A-HQ-1526783

Continuation of FD-302 of

[Redacted]

, On 10/05/2007, Page 4

b6
b7C

[Redacted] is nearing the end of her tour and will be soon
returning to the [Redacted] where she
will be a Contract Administration Specialist.

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE

Date: 11/08/2006

To: Records Management

Attn: [REDACTED]

Room 6147

b6
b7C

From: Criminal Investigative

Public Corruption Unit\Civil Rights Section

Contact: [REDACTED]

b6
b7C
b7E

Approved By: [REDACTED]

Drafted By: [REDACTED]

Case ID #: 58A-HQ-1526783-15

Title: IRAQ CONTRACT CORRUPTION INITIATIVE SUBFILE INTEL

Synopsis: Request to open subfiles to organize documents for the Iraq Contract Corruption Initiative (ICCI).

Details: On 05/09/2006, the Public Corruption Unit (PCU) created the Iraq Contract Corruption Initiative designed to enhance the FBI's ability to combat corruption and contracting fraud relating to the reconstruction of Iraq. A multi-agency International Contract Corruption Task Force (ICCTF) has been implemented in support of the ICCI. Information obtained through the task force will be electronically documented and maintained in ACS. The case subfiles are as follows:

INTEL -	(Intelligence)
LINSERTS -	(Liaison Inserts)
EMAIL -	(Emails)
CO-MEETS -	(Coordination Meetings)
ADMIN -	(Administrative)

58A-HQ-1526783-LINserts-1

OK

To: Records Management From: Criminal Investigative
Re: 58A-HQ-1526783, 11/08/2006

LEAD(s):

Set Lead 1: (Action)

RECORDS MANAGEMENT

AT WASHINGTON, DC

Open subfiles entitled:

INTEL
LIAISON INSERTS
EMAIL
COORDINATION MEETINGS

♦♦

58A-HQ-1526783



1

b6
b7C

On 01/29/2007



(PROTECT IDENTITY), a

b6
b7C
b7D



Also present during the interview was PMF

and ALAT After being

advised of the identities of everyone present provided
the following information:



b6
b7C
b7D

58A-HQ-1526783-Insert 1

- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 06/21/2007

[redacted] date of birth [redacted]
 [redacted] SSAN [redacted] was interviewed at his place of business, NATIONAL LOGISTICS ESTABLISHMENT (NLE), Block 9, Street 106, Villa #8, Jabriya, Kuwait. After being advised of the identity of the interviewing agents and the nature of the interview, he provided the following information:

[redacted] is [redacted] for NLE, which provides a variety of logistical support services for contractors operating in the Iraq/Kuwait theater. One of the services NLE offers is delivery of large amounts of cash to pay contractors' employees who do not use direct deposit. One of NLE's customers, TRIPLE CANOPY (TC) contracted with NLE to deliver \$155,180.00 in United States Currency to pay its employees providing security for the United States Department of State in Basra, Iraq. The cash was to have been delivered by an NLE employee directly to TC employee [redacted] in Kuwait City on Sunday, June 17. [redacted] was then going to deliver the money directly to TC in Basra.

TC deposited the money into NLE's account at BURGAN BANK in Kuwait. On Sunday, June 17th, around noon, [redacted] went to the bank and withdrew \$156,000.00, netting \$155,180.00 in cash after paying bank fees of \$820.00. He took the cash to his accountant [redacted] who counted the cash and certified it was the proper amount. Around 3:00 p.m.,

[redacted] gave the cash to NLE employee [redacted]. Several NLE employees saw [redacted] take the money from [redacted] including NLE's Contract Movement Control Manager, [redacted] was to have taken the money to [redacted] at a nearby villa in Kuwait City.

The following morning, [redacted] got a phone call from NLE employee [redacted] who stated that the money was never received by [redacted] or anyone else at TC. [redacted] told [redacted] who began calling [redacted] cell phone to attempt to find out what had happened. [redacted] did not answer his phone. [redacted] went to Kuwait International Airport, where, through a friend, he found out that [redacted] had boarded JAZEERA AIRWAYS flight number 406 to Bahrain at approximately 3:55 the previous day, or about an hour after he picked up the cash at NLE.

Investigation on 06/19/2007 at Kuwait City, Kuwait

File # 58A-HQ-1526783

Date dictated

SA [redacted] US Army CID

by SA [redacted]

58A-HQ-1526783-4 Inserts-3

58A-HQ-1526783

Continuation of FD-302 of [REDACTED], On 06/19/2007, Page 2

[REDACTED] sent two NLE employees to check [REDACTED] apartment, and they reported that several of [REDACTED] personal items were missing, including some clothing and luggage. [REDACTED] remembered that [REDACTED] had told him he was going to travel to Bahrain the previous Friday, June 15th, but when the driver showed up at [REDACTED] apartment to take him to the airport [REDACTED] said he had changed his mind. This coincided with the fact that the payment to TC was supposed to have been made on that Friday, but had been held up due to bank delays. Based on the above facts, [REDACTED] surmised that [REDACTED] had been planning to steal the cash since the previous week.

b6
b7C

[REDACTED] emailed [REDACTED] several times, urging him to come back to Kuwait and return the money, but got no response. [REDACTED] lives in [REDACTED] and is friendly with [REDACTED] informed [REDACTED] that she had gotten a series of text messages from [REDACTED] on June 18th, stating that he was himself getting a lot of messages from NLE but he didn't understand what the problem was. In one of his text messages to [REDACTED] stated that he was returning to Kuwait later that night. The cell phone number on which [REDACTED] received the messages was (256) 859-3083. As of June 21, 2007, no one at NLE had heard from [REDACTED]

b6
b7C

[REDACTED] provided copies of the bank withdrawal documents, as well as a photocopy of [REDACTED] Combined Access Card, all of which are attached to this report via 1A envelope.

b6
b7C

[REDACTED] also provided contact information for [REDACTED] residing at [REDACTED] telephone [REDACTED] Two other telephone numbers, [REDACTED] and [REDACTED] were also found in [REDACTED] contact information, but it was not clear to whom the numbers belonged. One may belong to [REDACTED] whose name [REDACTED] could not provide.

b6
b7C

[REDACTED] is described as follows:

b6
b7C

Full name:
Race:
Sex:
DOB:
SSAN:
Passport:
Height:

--

58A-HQ-1526783

Continuation of FD-302 of

, On 06/19/2007, Page 3

Weight:
Hair:
Eyes:
Tattoos:

b6
b7C

- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 09/22/2007

[redacted] was contacted by Special Agent (SA) [redacted] and SA [redacted] Army Criminal Investigation Division. [redacted] was advised of the identity of the interviewing agents by display of credentials, and was also advised that she was not under arrest.

b6
b7C

[redacted] provided the following information:

[redacted] was born in [redacted] and is an [redacted] citizen. [redacted] resides at [redacted] with [redacted] is a United States citizen. [redacted] have been married since 2001. [redacted] home phone number is [redacted] and her mobile phone number is [redacted] is a Systems Engineer and works in the Information Technology department at CSA. [redacted] has been in Kuwait since 1995.

b6
b7C

[redacted] has not been to Camp Arifjan in more than twelve months. When she did visit the base, she was always there to execute a contract on behalf of her employer, LEE DYNAMICS INTERNATIONAL (LDI). The last contract that LDI had which would cause [redacted] to go to Camp Arifjan involved bunk beds. [redacted] point of contact for this contract was Colonel [redacted] would also visit Camp Arifjan to assist in the procurement of CAC cards for LDI employees. [redacted] preferred to be directly involved in this process to ensure that nothing went wrong with obtaining the cards for LDI employees.

b6
b7C

[redacted] has never lived in the United States (U.S.), but has visited on two occasions. In 1998, [redacted] vacationed in the U.S. for approximately one month. In 2001, [redacted] traveled to the U.S., again for approximately one month, again on vacation.

b6
b7C

[redacted] is currently employed at LDI as Iraq Program Support Manager. [redacted] works closely with [redacted] reports directly to [redacted] As Program Support Manager [redacted] is responsible for paperwork regarding the LDI's contracts in Iraq,

b6
b7C

09/19/2007

Kuwait City, Kuwait

Investigation on

58A-HQ-1526783

at

09/20/2007

File #

SA [redacted] (Army CID)

Date dictated

SA [redacted]

by

58A-HQ-1526783 Inserts -4

b6
b7C

10-9-01

58A-HQ-1526783

Continuation of FD-302 of [REDACTED]

, On 09/19/2007 , Page 2

b6
b7C

including invoices, maintaining files pertaining to the contracts, and other administrative items such as these. [REDACTED] also facilitates obtaining whatever items and/or services LDI employees and associates performing the contracted services in Iraq need.

Prior to holding the position of Program Support Manager at LDI [REDACTED] was the office manager for LDI. [REDACTED] began her employment at LDI when LDI was formed in May 2005. When JAMES MARTIN was killed, [REDACTED] was promoted to take his position. [REDACTED] had done some of the work on the proposal, including the pricing, and therefore was promoted to the Program Support Manager position.

b6
b7C

[REDACTED] was the [REDACTED]. However, he now has a company in the U.S. and [REDACTED] is now the [REDACTED]. While [REDACTED] was [REDACTED] reported to [REDACTED] and would report to [REDACTED] in [REDACTED] absence. [REDACTED] does not supervise any employees at LDI, and has never solicited contracts on behalf of LDI. [REDACTED] is responsible only for contract execution.

b6
b7C

LDI has a new Kuwaiti sponsor. [REDACTED] has not met the new sponsor, but advised Kuwaiti law requires businesses in Kuwait to be at least 51% owned by Kuwaiti citizens. The remaining 49% was owned by [REDACTED] and [REDACTED] opined that when [REDACTED] started his business in the U.S., he had to terminate his business ownership in Kuwait. As far as [REDACTED] knows, [REDACTED] owns the remaining 49%. [REDACTED] could not recall the name of the new Kuwaiti sponsor/owner but will provide this information telephonically to SA [REDACTED].

b6
b7C

The change in Kuwaiti sponsorship/ownership has happened in the last approximately two months. [REDACTED] does not know why the change took place.

b6
b7C

LDI currently has a contract at Camp Arifjan for washers and dryers and a contract with BROWN INTERNATIONAL COMPANY (BIC). The contract with BIC involves replacing radios in military vehicles that have not been in service for some time.

[REDACTED] has heard about the case involving Major [REDACTED] from reading the newspaper and articles on the world wide web. Most of the employees at LDI have not met Major [REDACTED] recalled meeting Major [REDACTED] once at Camp Arifjan. In that meeting, [REDACTED] introduced himself to [REDACTED] and asked [REDACTED] about

b6
b7C

58A-HQ-1526783

Continuation of FD-302 of [REDACTED]

, On 09/19/2007, Page 3

b6
b7C

her family, if she was married, if she had children, and other questions one would ask when meeting another person for the first time.

[REDACTED] knew for whom [REDACTED] worked because of the contract LDI had to provide bunk beds at Camp Arifjan. [REDACTED] was the Contracting Officer for the bunk beds contract. [REDACTED] advised LDI that he did not have the authority to sign that particular contract and recommended that Colonel [REDACTED] be contacted regarding the bunk bed contract.

b6
b7C

[REDACTED] did not usually go to the base by herself and opined that [REDACTED] was probably with her when she met Major [REDACTED]. [REDACTED] also recalled seeing Major [REDACTED] at Camp Doha at church services, and recalled that Major [REDACTED] was a regular church goer. [REDACTED] also recalled contacting Major [REDACTED] regarding obtaining gate passes for Camp Arifjan.

b6
b7C

To [REDACTED] knowledge, Major [REDACTED] has never been to LDI. [REDACTED] is not aware of any of Major [REDACTED] associates coming to LDI, or of any business relationships Major [REDACTED] had with government contractors.

b6
b7C

[REDACTED] does not know [REDACTED] or [REDACTED]. [REDACTED] has never seen Major [REDACTED] with any other LDI employees. When asked about [REDACTED] understanding of Major [REDACTED] employment, [REDACTED] advised she only knew him to be a Contracting Officer. No one at [REDACTED] has told [REDACTED] anything about Major [REDACTED] position other than his being a contracting officer.

b6
b7C

To [REDACTED] knowledge, Major [REDACTED] has not been in contact with LDI or its employees since his departure from Kuwait. Furthermore, [REDACTED] is not aware of any contacts by Major [REDACTED] associates with LDI, since Major [REDACTED] departure from Kuwait.

b6
b7C

[REDACTED] is responsible for the Iraq Program, and therefore is not sure who at LDI dealt with Major [REDACTED] the most.

b6
b7C

LDI was started in May 2005. The Iraq Support contract began in August 2005, and lasted one year, terminating in August 2006. The proposal was submitted in June 2005 and awarded in July 2005, and began in August 2005.

58A-HQ-1526783

Continuation of FD-302 of [REDACTED]

, On 09/19/2007, Page 4

b6
b7C

Prior to being employed by LDI, [REDACTED] was employed at AMERICAN LOGISTICS SERVICES (ALS). [REDACTED] started working for ALS in approximately August 2003. She worked for ALS until LDI was formed on May 16, 2005. [REDACTED] began at ALS as an Administrative Assistant and was promoted to Office Manager. While at ALS, [REDACTED] had no dealings with any of the contracts in which ALS was involved.

b6
b7C

[REDACTED] of ALS and [REDACTED] owned [REDACTED] was the Business Development Manager. Because of differences in business ideas, (such as operational control of the business) and ethics between [REDACTED] and [REDACTED] ALS was terminated and LDI was formed.

b6
b7C

Lt. Colonel [REDACTED] came to ALS once on a social visit. [REDACTED] recalled that Lt. Colonel [REDACTED] had another individual with him, but [REDACTED] was not able to recall who this person was, only that is was a white male. Lt. Colonel was the point of contact for ALS' bunk bed contract at Camp Arifjan.

b6
b7C

[REDACTED] has no direct or indirect knowledge about Major [REDACTED] being offered, receiving or soliciting any bribes from LDI or any other contractors, nor was she present when Major [REDACTED] was given any thing of value.

b6
b7C

[REDACTED] told the LDI employees he did not understand why LDI was brought into this case. [REDACTED] told the employees that everything was okay, and he hoped that he would be given the chance to prove he had done nothing wrong.

b6
b7C

[REDACTED] has heard that others at LDI had been interviewed. However, [REDACTED] did not offer any preparation for the interviews or any warnings about the interviews to the employees.

[REDACTED] often had parties which were attended by ALS/LDI employees and others. These occasions included birthday parties, Thanksgiving, and others. [REDACTED] does not recall seeing Major [REDACTED] at any of these parties, but advised she did not attend all of the parties given by [REDACTED]

b6
b7C

Prior to being employed at ALS, [REDACTED] worked for AMERICAN GENERAL TRADING (AGT) from 1996 to 2002. While employed at AGT, [REDACTED] was an Administrative Assistant. As such, she processed purchase orders and invoices, and performed other duties such as typing and preparing quotes for contracts. AGT never asked [REDACTED] to do anything out of the ordinary while she was employed at AGT. [REDACTED] has not spoken to anyone at AGT since approximately 2004.

b6
b7C

58A-HQ-1526783

Continuation of FD-302 of [REDACTED]

, On 09/19/2007 , Page 5

b6
b7C

[REDACTED] met [REDACTED] during her first trip to the U.S. for vacation at the home of [REDACTED] which is located in Mount Holly, New Jersey. [REDACTED] has not had contact with [REDACTED] in quite some time, and recalled the last time she saw him was at one of [REDACTED] parties. [REDACTED] knew of [REDACTED] dream to visit the U.S. [REDACTED] encouraged [REDACTED] to save her money and make the trip to the U.S. when [REDACTED] would be in the U.S.

b6
b7C

[REDACTED] met [REDACTED] through [REDACTED] had trained [REDACTED] and was upset when she learned that [REDACTED] had hired [REDACTED] gave [REDACTED] an ultimatum, directing him to choose between [REDACTED] employment and [REDACTED] friendship. [REDACTED] picked [REDACTED] employment and the friendship ceased. [REDACTED] recalled that [REDACTED] business, AGT, was not doing all that well when she left. In fact, there were instances when [REDACTED] was not able to pay [REDACTED] salary and asked [REDACTED] to allow [REDACTED] to pay her the following month. However, after [REDACTED] left, AGT was awarded a laundry contract by the U.S. Army.

b6
b7C

[REDACTED] was the Contracting Officer on the Iraq contract. [REDACTED] has been to LDI on several occasions, and would check her emails and conduct other personal business while at LDI. [REDACTED] recalled that [REDACTED] would usually come to LDI to see [REDACTED]

b6
b7C

While at LDI, [REDACTED] would sign any documents that were required for the contracts, which would save [REDACTED] a trip to Camp Arifian, if the documents were ready for signature. [REDACTED] recalled that [REDACTED] came to LDI once every three to four months. [REDACTED] came once in her army uniform, and the other times would come in her civilian clothes. The time she came in her army uniform, [REDACTED] was on her way to LDI's warehouse to observe the facility.

b6
b7C

[REDACTED] is not aware of [REDACTED] using the beauty saloon owned by [REDACTED]. However, [REDACTED] recalled [REDACTED] receiving a Dhow from LDI. A Dhow is a boat that symbolizes the Kuwait fishing boat. The small Dhow that was sent to [REDACTED] was sent to her by [REDACTED] using the Army Post Office.

b6
b7C

[REDACTED] recalled seeing [REDACTED] at one of [REDACTED] dinner parties a long time ago. [REDACTED] was in the company of [REDACTED]

b6
b7C

[REDACTED] has no knowledge of any Department of Defense employees using the saloon owned by [REDACTED]

58A-HQ-1526783

Continuation of FD-302 of [REDACTED], On 09/19/2007, Page 6

b6
b7c

[REDACTED] had no further information pertaining to Major
[REDACTED]

- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 09/24/2007

[redacted] was contacted by Special Agent (SA) [redacted] and SA [redacted] Army Criminal Investigation Division. [redacted] was advised of the identity of the interviewing agents by display of credentials, and was also advised that she was not under arrest.

b6
b7C

[redacted] provided the following information:

[redacted] is a citizen of [redacted]. She was born on [redacted] resides at [redacted] with [redacted] and [redacted] home phone number is [redacted] and her mobile phone number is [redacted] is [redacted] and weighs approximately [redacted] has black hair and brown eyes, and has resided in Kuwait since August 2002.

b6
b7C

[redacted] began working at LEE DYNAMICS INTERNATIONAL (LDI) on January 1, 2006. Prior to being employed at LDI, [redacted] was a Sales Associates at the Sultan Center located across the street from LDI's office in Kuwait. [redacted] shopped at the Sultan Center every morning and came to know [redacted] was earning approximately 150 Kuwaiti Dinars (KDs) each month at the Sultan Center.

b6
b7C

[redacted] invited [redacted] to LDI to interview for a position with his company. After interviewing for the position with [redacted] was interviewed by [redacted] [redacted] was offered a position as LDI's receptionist. [redacted] was promoted to [redacted] in March 2006 and maintains that position presently. Her salary is now 250kd per month. As [redacted] is responsible for answering telephone calls and emails, and receiving guests who come to LDI to see [redacted]

b6
b7C

[redacted] has never met Major [redacted] has never seen Major [redacted] at LDI. However, [redacted] has seen his name on a LDI contract while performing her duties at LDI. Prior to the raid conducted at LDI, [redacted] had never heard [redacted] name mentioned at LDI.

b6
b7C

09/20/2007

Kuwait City, Kuwait

Investigation on

58A-HO-1526783

at

09/24/2007

File #

SA [redacted] (Army CID)

Date dictated

by

SA [redacted]

b6
b7C

cc

58A-HO-1526783-Inserts-5

58A-HQ-1526783

Continuation of FD-302 of [REDACTED]

, On 09/20/2007, Page 2

b6
b7C

[REDACTED] has a beauty saloon and a Thai gift shop near the office of LDI. [REDACTED] is not aware of any United States Government Official receiving any complimentary visits to the beauty saloon.

[REDACTED] has never met Lt. Col. [REDACTED]. However, [REDACTED] recalled seeing a picture at her office of a going away party honoring Lt. Col. [REDACTED]. In this picture are Lt. Col. [REDACTED] and [REDACTED] offered to scan this picture and send same, via email, to SA [REDACTED].

b6
b7C

[REDACTED] is not familiar with AMERICAN GENERAL TRADING (AGT) or with [REDACTED]. However, [REDACTED] thought that [REDACTED] might have worked at AGT before forming LDI. [REDACTED] recalled seeing business cards for [REDACTED] and [REDACTED] that looked similar.

b6
b7C

[REDACTED] asked [REDACTED] to go online and print a copy of the article in which Major [REDACTED] was reported to have been arrested. However, there has been no talk of [REDACTED] arrest at LDI that [REDACTED] has heard.

b6
b7C

[REDACTED] has never seen or is aware of any monies or gifts given by [REDACTED] to any U.S. Government employee.

[REDACTED] attended [REDACTED] birthday party at the home of [REDACTED] in 2006. Present at the party were several LDI employees and some of [REDACTED] friends. However, [REDACTED] did not know if there was anyone there from the U.S. Army.

b6
b7C

[REDACTED] has never assisted [REDACTED] or [REDACTED] in preparing any contracts.

b6
b7C

[REDACTED] only knows the name [REDACTED] because her name was mentioned in the newspaper article that [REDACTED] asked her to download from the internet.

[REDACTED] does not know [REDACTED]

b6
b7C

The interview was then concluded.

- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 10/23/2007

[redacted] born [redacted] in [redacted] Social Security Number [redacted] was voluntarily interviewed by Special Agent [redacted] Special Agent [redacted] DCIS, and Special Agent [redacted] Army CID. [redacted] was advised of the identity of the interviewing agents and was further advised that she was not under arrest and that she could terminate the interview at any time. [redacted] thereafter provided the following information:

[redacted] is a Department of Defense (DOD) civilian employed at Camp Arifjan, Kuwait. [redacted] current assignment is the third time she has been deployed to Kuwait. The first time [redacted] was deployed to Kuwait was in 2003, when she served as a Contract Specialist for six months in Camp Doha. The second deployment was for one year in 2004 and 2005, again at Camp Doha, where she served as a Contract Administrative Specialist. In her current assignment she began as a Contract Specialist in November, 2006, but was given a \$1 million warrant and promoted to Contract Officer in December, 2006.

At the end of her current assignment, [redacted] expects to return to the [redacted] resides in [redacted] at the following address:

[redacted]
[redacted] home telephone number is [redacted] and her mobile phone number is [redacted]. While in Kuwait, [redacted] resides at [redacted]. This residence was assigned to [redacted] by base housing.

[redacted] recalled first meeting Major [redacted] while the two were serving at Camp Doha. [redacted] never worked with [redacted] at Camp Doha because Major [redacted] worked in procurement and [redacted] was in combat support.

Likewise, [redacted] never worked with [redacted] because, like [redacted] worked in procurement. [redacted] often hosted parties for the contracting command. Some of these parties

10/05/2007 Camp Arifjan, Kuwait

Investigation on 58A-HQ-1526783

at

10/20/2007

File # SA [redacted]

Date dictated

by

58A-HQ-1526783-Inserts-10

58A-HQ-1526783

Continuation of FD-302 of [REDACTED]

, On 10/05/2007, Page 2

b6
b7C

were at [REDACTED] home and others were at the office. [REDACTED] heard of parties hosted on [REDACTED] boat, but [REDACTED] never attended these parties and was unable to provide any information regarding same.

[REDACTED] declined to speculate about [REDACTED] spending habits, but advised that she was not able to afford a boat or a villa, based upon the salary she was earning as a Contract Officer for the United States Army. [REDACTED] has, however, heard that [REDACTED] lifestyle partner had money and heard he [REDACTED] (lifestyle partner) was a foreigner.

b6
b7C

Regarding the contract to provide laundry services for military installations in Kuwait, [REDACTED] recalled that a competitive range was established and eleven contractors were determined to be within the competitive range. Because some of the contractors within the competitive range did not, at that time, have access to the base, it was determined that a location off post was needed to have discussions with the eleven contractors within the competitive range.

b6
b7C

Contact was made with the housing unit and it was determined that a flat that was not then being used would be suitable to have these discussions. [REDACTED] advised the Contract Command, including Colonel [REDACTED] was aware of the request made to housing to use the flat, as was [REDACTED] in the legal unit.

b6
b7C

In addition to using the flat to hold meetings with the potential contractors, Contract Command decided to use the flat as a training tool for Contracting Officers and Contract Specialists. Contracting Officers and Contract Specialists were present, as spectators, during the meetings with the potential contractors, to observe the meetings and use the meetings as training to better do their jobs in the future. In addition to the Contracting Officers and Contract Specialists, Lieutenant [REDACTED] Captain [REDACTED] and SFC [REDACTED] were also at some of the meetings, as was Major [REDACTED]

b6
b7C

The contracting Officers who were at the meetings to observe the discussions included Master Sergeant [REDACTED] Major [REDACTED] Major [REDACTED] and Major [REDACTED]

b6
b7C

[REDACTED] recalled that the flat in which the meetings were held was a "sterile" environment. Contractors were told to meet at

58A-HQ-1526783

Continuation of FD-302 of [REDACTED]

, On 10/05/2007 , Page 3

b6
b7C

a location near the flat in which the meetings were held and then led to the flat.

After meeting with the potential contractors, it was determined that LEE DYNAMICS INTERNATIONAL (LDI) had the best bid. Three different review boards were asked to look at the award and all three agreed that LDI was the best bidder. Each of these review boards consisted of approximately six people. [REDACTED] recalled that Capt. [REDACTED] was the chairman for one of the review boards. However, Command determined that the form used for this contract was the wrong form. The contract, which was worth between \$4.8 million and \$8 million, should have been placed on SF 33. However, it had been placed on form SF 1449. Based upon this error, the contract was cancelled. The laundry contract was then turned over to [REDACTED] to be re-worked.

b6
b7C

[REDACTED] advised that she was responsible for the contractors using the wrong forms. [REDACTED] explained that it was a mistake and the Contracting Office ultimately removed her from working on the laundry contract.

b6
b7C

A bridge contract to AGT was awarded to keep laundry services in place until another contract could be awarded.

[REDACTED] had never met anyone from AGT until the meeting at the flat. [REDACTED] recalled that [REDACTED] owned AGT and were there with two technical representatives who were to help AGT with the contract.

b6
b7C

[REDACTED] last spoke with Sgt. [REDACTED] approximately one week ago, via telephone. The conversation was only a friendly one and no discussion regarding any contracts took place.

[REDACTED] and Sgt. [REDACTED] would often go off post to collect bid proposals from potential contractors. This was done to help the potential contractors who were unable to get on the base easily, or unable to get on the base at all. It was not unusual to have bidders meet [REDACTED] and/or [REDACTED] at the Starbucks to submit proposals or bids. [REDACTED] again used the term "sterile" to describe this process. [REDACTED] advised that bid announcements often provided three alternatives to have the bids considered, including mail, deliver to Camp Arifjan, or deliver proposals to the Starbucks to be picked up by [REDACTED] and/or [REDACTED]

b6
b7C

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE

Date: 03/18/2008

To: Criminal Investigative

From: Criminal Investigative

Public Corruption Civil Rights Section, Public
Corruption Unit/ ICCTF

Contact: IA [REDACTED]

Approved By: [REDACTED]

Drafted By: [REDACTED]

Case ID #: 58A-HQ-1526783-LIAISON ^{Inserts - j1} (None)

Title: DEFENSE CRIMINAL INVESTIGATIVE SERVICE
INTERNATIONAL CONTRACT CORRUPTION TASK FORCE (ICCTF)
JOINT OPERATIONS CENTER (JOC) BRIEFING

Synopsis: This Report documents an ICCTF/JOC briefing provided to Defense Criminal Investigative Service (DCIS) held at DCIS Headquarters (HQ) to provide information about the ICCTF/JOC to DCIS Special Agents (SA) traveling to [REDACTED] place on 07 February, 2008.

Details: Intelligence Analysts (IAS) [REDACTED] and [REDACTED] traveled to DCIS HQ in Pentagon City, VA on 07 February, 2008 to provide a briefing about the ICCTF's JOC. The meeting was attended by DCIS SAs [REDACTED]

IAS [REDACTED] and [REDACTED] briefed attendees about the JOC mission, JOC personnel, JOC capabilities, JOC work process flows, JOC work product examples, and answered all questions. IAS [REDACTED] and [REDACTED] brought finished JOC work products as examples of JOC capabilities to the field and discussed each one to all attendees. IAS [REDACTED] and [REDACTED] collected all contact information from attendees and emailed them JOC contact information and a soft copy of a request for assistance (RFA) document.

♦♦

[REDACTED]

to training provided
about

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
FOI/PA# 1493849-000

Total Deleted Page(s) = 40

Page 3 ~ Referral/Direct;
Page 4 ~ Referral/Direct;
Page 5 ~ Referral/Direct;
Page 6 ~ Referral/Direct;
Page 7 ~ Referral/Direct;
Page 8 ~ Referral/Direct;
Page 9 ~ Referral/Direct;
Page 10 ~ Referral/Direct;
Page 11 ~ Referral/Direct;
Page 12 ~ Referral/Direct;
Page 13 ~ Referral/Direct;
Page 14 ~ Referral/Direct;
Page 15 ~ Referral/Direct;
Page 16 ~ Referral/Direct;
Page 17 ~ Referral/Direct;
Page 18 ~ Referral/Direct;
Page 19 ~ Referral/Direct;
Page 20 ~ Referral/Direct;
Page 21 ~ Referral/Direct;
Page 22 ~ Referral/Direct;
Page 23 ~ Referral/Direct;
Page 24 ~ Referral/Direct;
Page 25 ~ Referral/Direct;
Page 26 ~ Referral/Direct;
Page 27 ~ Referral/Direct;
Page 28 ~ Referral/Direct;
Page 29 ~ Referral/Direct;
Page 32 ~ b6; b7C; b7E;
Page 33 ~ b6; b7C; b7E;
Page 34 ~ b6; b7C; b7E;
Page 35 ~ b6; b7C; b7E;
Page 38 ~ Duplicate;
Page 41 ~ Duplicate;
Page 42 ~ Duplicate;
Page 50 ~ Duplicate;
Page 51 ~ Duplicate;
Page 52 ~ Duplicate;
Page 53 ~ Duplicate;
Page 54 ~ Duplicate;
Page 55 ~ Duplicate;

XXXXXXXXXXXXXXXXXXXXXXXXX
X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXXXXXX

318E-WF-240199

Continuation of FD-302 of

[Redacted]

, On 10/01/2010, Page 6

b6
b7C

The purchase of securities is not permitted by the loan agreement.

Section 7.04

Restricted Payments

After project completion, a borrower may make restricted payments but only if the loan is not in default and if the borrower makes mandatory prepayments to OPIC. The COPASBA project was never completed. No restricted payments are allowed by the credit agreement. No payments to affiliates are allowed, unless as part of an arms length transaction.

[Redacted] has not seen a reference to bank statements for the principles or guarantors in the Credit Agreement. The Sponsor Disclosure Reports (SDR) were required and submitted, but [Redacted] is still trying to locate them.

b6
b7C

The SDR form (OMB form 129) includes language that states that it is a federal offense to provide inaccurate information on the form.

COPASBA affiliates are considered principles and guarantors of the borrowers.

UNCLASSIFIED

To: Washington Field From: Washington Field
Re: 318E-WF-NEW, 05/28/2009

In the Litigation Book, MORRISON explained COPASBA was [redacted] in 1995. The principals of COPASBA are [redacted] and [redacted]. The company produces toilet paper and napkins for the Mexican market by converting large rolls of raw paper into final products.

b6
b7c

In 2006, COPASBA sought funding from WBC in order to finance expansion and operation of COPASBA's operations in Mexico. The purpose of the loan was to construct a new warehouse, purchase new and used equipment, and provide permanent working capital to fund projected sales growth. As part of the loan application process, COPASBA submitted their intended uses for the loan proceeds and several trade references.

Investigative work conducted by private investigators on behalf of WBC and OPIC, determined that COPASBA failed to use the loan proceeds as they had originally stipulated and the trade references provided to WBC were fraudulent. The private investigators also noted evidence that suggested a scheme to abscond with the purchased equipment, contrary to the representations made by COPASBA in a side letter.

Assistant United States Attorneys, [redacted] and [redacted] have been assigned to the captioned investigation.

b6
b7c

It is requested that the captioned case and sub-files be opened and assigned to the writer.

♦♦

UNCLASSIFIED

UNCLASSIFIED

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE

Date: 06/17/2009

To: Washington Field

From: Washington Field
Squad CR-13 / ^{NVDA}

Contact: SA [REDACTED]

b6
b7C
b7E

Approved By: [REDACTED]

Drafted By: [REDACTED]

Case ID #: 318E-WF-240199 (Pending)

Title: [REDACTED]

b6
b7C

OVERSEAS PRIVATE INVESTMENT CORPORATION - victim;
WORLD BUSINESS CAPITAL, INC. - victim;
CORPORATE FRAUD

Synopsis: Update captioned case.

Details: On June 10, 2009, meeting occurred at Overseas Private Investment Corporation (OPIC), 1100 New York Avenue, Washington, D.C., to discuss captioned matter. The following individuals were present for the duration of the meeting:

AUSA [REDACTED] USAO-DC

AUSA [REDACTED] DOJ-Fraud Section

SA [REDACTED] FBI-WFO

[REDACTED] OPIC Assistant General Counsel

Atty. [REDACTED] Partner, Morrison &

Foerster LLP

Atty. [REDACTED] WorldBusiness Capital, Inc. (WBC)

b6
b7C

OPIC and WBC agreed to provide the FBI and DOJ with the following items:

- OPIC and WBC records containing all email and other written correspondence with [REDACTED] Corporativo Papelero y de Suministros Basicos, S.A. de C.V. (COPASBA), and their representatives

b6
b7C

UNCLASSIFIED

b6
b7C

UNCLASSIFIED

To: Washington Field From: Washington Field
Re: 318E-WF-NEW, 06/17/2009

- Banking documents pertaining to the COPASBA loan transaction
- Copies of the May 2007 and August 2007 independent property appraiser reports, including photographs, for COPASBA property in Mexico

♦♦

UNCLASSIFIED

On July 2, 2009, the following investigative activity was conducted by SA [REDACTED] at [REDACTED]

b6
b7C

SA [REDACTED] took possession of a box of documents voluntarily provided to the United States Department of Justice, Criminal Division, Fraud Section, by [REDACTED] Assistant General Counsel, Overseas Private Investment Corporation (OPIC), 1100 New York Avenue, N.W., Washington, D.C. 20527, telephone number (202) 336-8400.

b6
b7C

On July 17, 2009, SA [REDACTED] reviewed the contents of the box provided by OPIC. The following was gleaned during the review of the box contents:

The box contained a letter and twelve file folders. The letter, addressed to [REDACTED] U.S. Department of Justice, Criminal Division, Fraud Section, signed by [REDACTED] OPIC Assistant General Counsel, and dated June 24, 2009, described the box contents as "a complete copy of the Overseas Private Investment Corporation's files for the COPASBA transaction, excluding only the documents pertaining to the engagement of Morrison & Foerster LLP to act on behalf of the Overseas Private Investment Corporation in connection with the preparation of the COPASBA litigation book." The twelve file folders are labeled "World Business Capital, Inc., COPASBA, Mexico" and further described as:

b6
b7C

1. File List
2. Effects
3. Credit Approval
4. Loan Disbursement Request
5. Closing Documents
6. Referral to the Department of Justice
7. WBC Claim Documents
8. Memoranda
9. Promissory Notes
10. Correspondence Re: Loan Cancellation/Forgiveness
11. Annex I
12. Annex II

The files and documents have been placed in an FD-340 for inclusion in referenced case file.

The following investigative activity was conducted by SA [REDACTED] at the Washington Field Office-NVRA, 9325 Discovery Blvd., Manassas, Virginia 20109:

b6
b7C

On August 10, 2009 SA [REDACTED] received a FedEx package from Attorney [REDACTED] of HILLS STERN & MORLEY LLP, 1120 Twentieth Street, N.W., 2nd Floor North Building, Washington, D.C. 20036, telephone number (202) 822-1600. The FedEx package contained a cover letter from [REDACTED], a CD-rom and certain documents and correspondence related to the COPASBA loan default.

The contents of the FedEx package have been placed in an FD-340 for inclusion in case file.

(X)
a

UNCLASSIFIED

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE

Date: 10/01/2009

To: Washington Field

From: Washington Field
Squad CR-13 / NVRA
Contact: SA [REDACTED]

Approved By: [REDACTED]

Drafted By: [REDACTED]

Case ID #: 318E-WF-240199 (Pending)

Title: [REDACTED]

OVERSEAS PRIVATE INVESTMENT CORPORATION - victim;
WORLD BUSINESS CAPITAL, INC. - victim;
CORPORATE FRAUD

Synopsis: Update captioned case.

Details: On September 29, 2009, a case status meeting was conducted at the Department of Justice, Fraud Section, 1400 New York Avenue, NW, Washington, D.C. AUSA [REDACTED] DOJ Trial Attorney [REDACTED] and the writer were present for the meeting. The following planned investigative steps were discussed:

1. SA [REDACTED] and DOJ financial analyst/auditor will analyze and schedule in an Excel spreadsheet all incoming wires/deposits from COPASBA to [REDACTED] and/or [REDACTED] bank accounts.

2. Attorney [REDACTED] and AUSA [REDACTED] will issue Grand Jury subpoenas [REDACTED]

3. Attorney [REDACTED] will issue [REDACTED] subpoenas [REDACTED]

UNCLASSIFIED

b6
b7C
b7E

b6
b7C

b6
b7C

b3
b6
b7C

X
C

UNCLASSIFIED

To: Washington Field From: Washington Field
Re: 318E-WF-240199, 10/01/2009

4. AUSA [redacted] will begin work on ex parte applications and orders for tax return information for [redacted] and [redacted]

b6
b7C
b7D

5. SA [redacted] will draft MLAT affidavit for [redacted]

6. USAO financial analyst will begin developing an asset analysis for [redacted]

b6
b7C

7. SA [redacted] will initiate a TECS/INS records request for [redacted] from January 2005 into the future. TECS request will be for US-Mexico travel/border crossing.

8. SA [redacted] will initiate dialog with OIA FBI Legat Mexico to determine likelihood and availability of Mexican law enforcement assistance [redacted]

b6
b7C
b7D

for [redacted] in Puebla, Mexico.

On October 1, 2009, DOJ Auditor, [redacted] was assigned to the captioned matter by the United States Attorney's Office for the District of Columbia. The following FD-340's were provided to AUSA [redacted] and Auditor [redacted]

b6
b7C

318E-WF-240199-1A1
318E-WF-240199-1A2
318E-WF-240199-1A3
318E-WF-240199-1A4
318E-WF-240199-1A5
318E-WF-240199-1A7
318E-WF-240199-1A8
318E-WF-240199-1A9
318E-WF-240199-1A10
318E-WF-240199-1A11

♦♦

UNCLASSIFIED

The following investigative activity was conducted by SA [REDACTED] at the Washington Field Office-NVRA, 9325 Discovery Blvd., Manassas, Virginia 20109:

On January 8, 2010, victim notification letters addressed to Overseas Private Investment Corporation and WorldBusiness Capital, Inc. were returned to the FBI Washington Field Office as undeliverable.

The returned letters have been placed in an FD-340 for inclusion in case file.

- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 10/07/2010

[redacted] (previously identified), Overseas Private Investment Corporation (OPIC) Assistant General Counsel, was telephonically interviewed. AUSA [redacted] and DOJ Fraud Section Trial Attorney [redacted] were present for the duration of the call. Shortly after the telephone call [redacted] indicated that he had additional information to provide. He was telephonically interviewed a second time on the same day by the writer. AUSA [redacted] and DOJ Fraud Section Trial Attorney [redacted] were not present for the second telephone call. [redacted] was familiar with the interviewing Agent and the attorneys. [redacted] voluntarily provided the following information:

b6
b7C

FIRST TELEPHONE CALL

[redacted] OPIC Associate General Counsel for Small and Medium Enterprises (SMEF) has legal oversight of the OPIC Finance Section. [redacted] is the OPIC Director of Credit Policy. [redacted] is the OPIC Vice President SMEF.

b5
b6
b7CInvestigation on 10/01/2010 at Manassas, Virginia (telephonically)File # 318E-WF-240199 -24 Date dictated n/aby SA [redacted]b6
b7C

318E-WF-240199

Continuation of FD-302 of

[Redacted]

, On 10/01/2010, Page 2

b6
b7C

b5
b6
b7C

318E-WF-240199

Continuation of FD-302 of

[Redacted]

, On 10/01/2010, Page 3

b6
b7C

b5
b6
b7C

318E-WF-240199

Continuation of FD-302 of

[Redacted]

, On 10/01/2010 , Page 4

b6
b7C

[Redacted]

b5
b6
b7C

318E-WF-240199

Continuation of FD-302 of

, On 10/01/2010 , Page 5

b5

b6

b7C

SECOND TELEPHONE CALL

COPASBA did in fact provide financial statements as part of the loan application process. COPASBA principles provided certifications of the accuracy of COPASBA financial statements.

has not yet found in OPIC's loan documentation were the principles provided personal financial statements.

b6

b7C

Upon further review of COPASBA loan documents noted that COPASBA disclosed affiliate companies. Representatives of COPASBA affiliates signed the promissory note.

OPIC has a copy of two guarantee agreements. The agreements and COPASBA's disclosure of affiliates were previously provided to investigators (redwell Annex 2, tab 3 through 6).

Four affiliate companies were disclosed during the loan application and representatives of these affiliates signed the credit agreement as guarantors. The COPASBA affiliates are as follows:

RED'S TRANSPORTATION, S.A. DE C.V.
RT LOGISTICS CARRIERS, S.A. DE C.V.
DESARROLLIOS INMOBILIARIOS CORPORATIVOS, S.A. DE C.V.
(roughly translated: corporate real estate development)
GRUPO CORPORATIVO SUMINISTROS, S.C.
(roughly translated: corporate supply group)

referenced the following sections of the COPASBA Credit Agreement:

b6

b7C

Section 3.03

Financial Conditions

In this section, the borrower represents that the financial statements provided by COPASBA are complete and correct.

Section 6.12

Use of Proceeds

UNCLASSIFIED

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE

Date: 05/28/2009

To: Washington Field

From: Washington Field
Squad CR-13 / NVPA

Contact: SA [REDACTED]

Approved By: [REDACTED]

Drafted By: [REDACTED]

Case ID #: ✓ 318E-WF-NEW (Pending)
318E-WF-NEW-ELA (Pending)
318E-WF-NEW-ELA 1 (Pending)
318E-WF-NEW-ELA 2 (Pending)
318E-WF-NEW-1023 (Pending)
318E-WF-NEW-GJ (Pending)
318E-WF-NEW-FF (Pending)
318E-WF-NEW-FA (Pending)

Title: [REDACTED]

OVERSEAS PRIVATE INVESTMENT CORPORATION - victim;
WORLDBUSINESS CAPITAL, INC. - victim;
CORPORATE FRAUD

Synopsis: Open and assign captioned matter.

Details: In July 2006, Corporativo Papelero y de Suministros Basicos, S.A. de C.V. (COPASBA), a Mexican company, fraudulently entered into a loan agreement with WorldBusiness Capital, Inc. (WBC), a commercial finance company, and later defaulted on that loan. The loan was guaranteed by a company called Overseas Private Investment Corporation (OPIC), an agency of the United States Government. After default by COPASBA, WBC submitted a loss claim in the amount of \$7,782,200 under the loan guarantee agreement with OPIC, and OPIC paid the claim.

Morrison & Foerster LLP (MORRISON), legal counsel for OPIC, presented a Litigation Book, dated March 30, 2009, to the Department of Justice, Criminal Division, which outlines allegations of mail fraud and wire fraud by COPASBA.

UNCLASSIFIED

O+A new 318E
assign to
SA [REDACTED]
5/28/09
[REDACTED]

b6
b7C
b7E

b6
b7C

b6
b7C

318E-WF-240199-1

la.upd

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
FOI/PA# 1493849-000

Total Deleted Page(s) = 2
Page 3 ~ Duplicate;
Page 4 ~ Duplicate;

XXXXXXXXXXXXXXXXXXXXXXXXX
X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXXXXXX

196C-HO-59147 SUB INDIA

Continuation of FD-302 of

, On 8/2/02, Page 2

[redacted] advised that [redacted]
Industrial Development Bank of India (IDBI), Mumbai, India,
telephone number [redacted] is actively involved in the
Enron/MSEB dispute, and could assist the U.S. Government in
contacting Receiver [redacted]

b6
b7C

- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 08/02/2002

[redacted] Deputy Legal Counsel, Oversees Private Investment Corporation (OPIC), 1100 New York Avenue NW, Washington, D.C., 20527, work telephone number [redacted] was telephonically contacted at his place of employment. After being advised of the nature of the interview and the identity of the interviewing Agent, [redacted] provided the following information:

b6
b7C

OPIC is an independent United States federal agency that assists in the economic growth of developing countries and emerging markets. OPIC programs include investment insurance (political risks, political violence, expropriation), project finance (loan guarantees) and investment funds.

Enron Corporation (Enron) has an existing \$200 million political risk insurance policy, on it's Dabhol Power Plant project, in India. In early 2002, Enron filed a claim with OPIC, after India's Maharashtra State Electric Board (MSEB) and India's Central Government, failed to make contractual payments to them in 2001. OPIC has requested more information from Enron (claimants). Once OPIC receives Enron's reply, OPIC will decide whether to pay compensation on that claim.

Bank of America (BOA) has an existing \$40 million loan guarantee policy, related to their financing of the Dabhol Power Plant project, in India. In early 2002, BOA filed a claim with OPIC, after Enron experienced problems with MSEB and India's Central Government. OPIC has requested more information from BOA (claimants). Once OPIC receives BOA's reply, OPIC will decide whether to pay compensation on that claim.

[redacted] has made several trips to India, related to OPIC's investment insurance and loan guarantees on the Dabhol Power Plant, and was aware that Enron filed suit in the Indian courts and that [redacted] has been appointed as a "receiver" by the High Court in Bombay, India. Although OPIC has written several letters and made several telephone calls to Receiver [redacted] Receiver [redacted] has not contacted OPIC.

b6
b7CInvestigation on 8/2/02 at Washington, D.C. (telephonically)File # 196C-HO-59147 SUB 302-351
196C-HO-59147 SUB INDIA -9

Date dictated _____

by Special Agent [redacted]b6
b7C
b7E

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
FOI/PA# 1493849-000

Total Deleted Page(s) = 7

Page 3 ~ Duplicate;
Page 7 ~ Duplicate;
Page 8 ~ Duplicate;
Page 12 ~ Duplicate;
Page 13 ~ Duplicate;
Page 16 ~ Duplicate;
Page 18 ~ Duplicate;

XXXXXXXXXXXXXXXXXXXXXXXXX
X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXXXXXX

- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 02/07/2002

On February 7, 2002, [redacted] residing at [redacted]

b6
b7C

[redacted] phone: [redacted] currently employed at Wilmer Cutler and Pickering, 2445 M Street, Washington, D.C., phone: [redacted] was interviewed by representatives of the Federal Bureau of Investigation (FBI). The purpose of the interview was to discuss several boxes of ENRON related documents that were taken from the Overseas Private Investment Corporation (OPIC). After advising the nature of the interview and the identity of the interviewing agents [redacted] provided the following information:

b6
b7C

[redacted] has no ENRON related documents in his possession because he provided them to the interviewing agents earlier in the week. [redacted] did make copies of computer files from his office computer at OPIC, but maintains that the files were personal in nature including resumes, and photos of his children. With respect to other OPIC documents in his possession, [redacted] stated that he has personal files on the other projects that he reviewed during his position as [redacted] estimates that OPIC works on approximately one hundred (100) projects per year, and that he personally reviewed approximately twenty (20) to thirty (30) deals per year as [redacted]

b6
b7C

[redacted] believes that whatever copies he has in his personal files, OPIC should have the original documents at their office. When leaving OPIC, all employees go through a clearance process where [redacted] reviews the items that are being removed from OPIC. [redacted] feels that since he went through the clearance process and that he only removed his personal files, he did not do anything inappropriate. [redacted] believes that OPIC should have the original or better copies of any item that he took when he left OPIC.

b6
b7C

[redacted] informed the interviewing agents that his law firm currently represents OPIC, and that OPIC is his client.

b6
b7CInvestigation on 02/07/02 at Washington, D.C.File # 196C-HO-59147Date dictated 02/07/02

by [redacted]

b6
b7C
b7E

196C-HO-59147(600)-12

196C-HO-59147

- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 02/06/2002

On February 5, 2002, [redacted]

residing at [redacted]

phone: [redacted]

[redacted] currently employed at Wilmer Cutler and Pickering, 2445 M Street, Washington, D.C., phone: [redacted] was interviewed by representatives of the Federal Bureau of Investigation (FBI). The purpose of the interview was to discuss several boxes of ENRON related documents that were taken from the Overseas Private Investment Corporation (OPIC). After advising the nature of the interview and the identity of the interviewing agents, [redacted] provided the following information:

Wilmer Cutler and Pickering was contracted by The Special Committee of ENRON for an investigation into ENRON's business practices. [redacted] advised that he was not participating in the investigation. [redacted] was formerly employed at OPIC as the General Counsel, and described OPIC as part bank and part insurance company. OPIC is a government agency with representatives of the public and private sectors on its Board of Directors. Government agency representatives include: United States Trade Representatives (USTR), The State Department, Department of Labor, Department of Commerce, and Department of the Treasury. The President, Chief Executive Officer (CEO), Executive Vice-President (EVP) and General Counsel are all appointed position by the President of The United States.

OPIC acts as an insurance company because it insures United States (U.S.) investors that are dealing in business ventures internationally from acts of war, inconvertibility of currency, expropriation, and other detrimental political events in a country. OPIC also loans money to U.S. investors acting in association with local investors from the host countries. OPIC uses its position to help leverage the capital in a new business.

While employed at OPIC, [redacted] reviewed contracts of ENRON business deals overseas, and then forwarded the approved contracts back to the appropriate attorney at OPIC. Prior to leaving in February 2001, [redacted] made copies of all the deals on ENRON business activities. [redacted] believes that making copies of contracts that an attorney worked on is common practice, and he does not feel that it was a violation of the OPIC Code of Conduct or records retention

10# GJS sub B

Investigation on 02/05/02 at Washington, D.C.File # 196C-HO-59147 (GDR) 13 Date dictated 02/06/02

by SA [redacted]

SA [redacted]

CT

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

196C-HO-59147-GOV-13

b6
b7Cb6
b7Cb6
b7Cb6
b7C
b7E

196C-HO-59147

- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 02/07/2002

On Wednesday, February 6, 2002, [REDACTED]

b6
b7C

[REDACTED] OVERSEAS PRIVATE INVESTMENT CORPORATION (OPIC), 1100 New York Avenue, Washington, D.C., work phone: (202) 336-8410, was interviewed by representatives of the Federal Bureau of Investigation (FBI). Also present during the interview was [REDACTED] and [REDACTED] Deputy General Counsel for OPIC. The purpose of the interview was to discuss numerous boxes that were removed from OPIC that may retain ENRON documents. After providing the nature of the interview and the identity of the interviewing agents, [REDACTED] provided the following information:

b6
b7C

[REDACTED] was the [REDACTED] for OPIC when [REDACTED] started employment with OPIC. [REDACTED] was [REDACTED] during his tenure with OPIC. On March 3, 4, 2001, [REDACTED] terminated his employment with OPIC.

b6
b7C

Prior to leaving, [REDACTED] walked around the office of [REDACTED] and he identified the items he wanted packed. [REDACTED] recalled there were thirty-eight (38) boxes for [REDACTED] recalls packing at least thirty-one (31) to thirty-two (32) of the boxes, and she itemized the contents of at least twenty-four (24) of the boxes. [REDACTED] packed five (5) or six (6) boxes himself [REDACTED] did not know the contents of the five (5) or six (6) boxes [REDACTED] packed. [REDACTED] packed items which were located in about twelve (12) file cabinets. The file cabinets were located on the 12th floor of OPIC, near the mailroom and corporate secretary. [REDACTED] recalled that a moving company picked up the boxes for [REDACTED] and the boxes were taken to a storage facility in Maryland. [REDACTED] did not know the name of the moving company or storage company.

b6
b7C

[REDACTED] also tasked [REDACTED] to get him three (3) to four (4) special computer disk just before he left OPIC. [REDACTED] did not state what he was going to do with the disk. [REDACTED] was a technical person, who assisted [REDACTED] and showed him how to download information on [REDACTED] computer.

b6
b7C

[REDACTED] stated that [REDACTED] never asked her to make copies of files.

b6
b7CInvestigation on 02/06/2002 at Washington, D.C.File # 196C-HO-59147 (60V)-18

Date dictated _____

by [REDACTED]

b6
b7Cb6
b7C
b7E

196C-HO-59147-60V-18

- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 02/05/2002

On February 5, 2002, [redacted] of OVERSEAS PRIVATE INVESTMENT CORPORATION (OPIC), 1100 New York Avenue, N.W., Washington, D.C., phone: (202) 336-8410, was interviewed by representatives of the Federal Bureau of Investigation (FBI). Also present during the interview was [redacted] Deputy General Counsel for OPIC. The purpose of the interview was to discuss numerous boxes that were removed from OPIC that may retain ENRON documents. After providing the nature of the interview and the identity of the interviewing agents, [redacted] provided the following information:

b6
b7C

OPIC acts in the position of an investment banker in that they find private investors that will supply capital for start-up business around the world. OPIC recently received requests from the press about providing documents as they relate between OPIC and ENRON business ventures. The officers of OPIC, including President, Executive Vice-President, and General Counsel, are politically appointed by the President of the United States' administration. During the course of retrieving boxes of documents from various former officers of OPIC that were being held in storage, it was discovered that the boxes of [redacted] were missing from the central files location. [redacted] was employed at OPIC for seven(7) years and left his position on February 21, 2001.

b6
b7C

[redacted] recalls that [redacted] had brought many boxes when he first came to OPIC. When [redacted] left OPIC in February 2001, [redacted] recalls [redacted] taking approximately thirty-eight(38) boxes that were originally put into storage. [redacted] was able to detail the contents of twenty-four(24) of the boxes. [redacted] believes that [redacted] also used a "zip-drive" to copy the contents of his hard drive computer when leaving OPIC.

b6
b7C

On January 25, 2002, [redacted] called the National Archives and Records Administration (NARA) to get guidance on how to proceed with the above matter. With input from the Inspector General's Office, [redacted] drafted a letter to [redacted] about the documents, but did not send the letter. On January 31, 2002, [redacted] received a letter from the Senate Finance Committee

b6
b7CInvestigation on 02/05/02 at Washington D.CFile # 196C-HO-59147-(60)-14 Date dictated _____

by [redacted]

b6
b7C
b7E

196C-HO-59147-GOV-14

196C-170-59147

196C-HO-59147

Continuation of FD-302 of

, On 02/05/02

, Page 2

b6
b7C

requesting all documents relating to ENRON since 1995. On February 1, 2002, [] received a call from the Justice Department that all documents relating to ENRON should be preserved and forwarded to the Justice Department. On February 4, 2002, [] sent an office wide e-mail stating that no documents should be destroyed until further notice.

[] is currently employed at WILMER, CUTLER and PICKERING. Prior to leaving OPIC, [] was briefed on OPIC's record retention policy. Two(2) of the boxes taken by [] are believed to contain ENRON boxes, specifically relating to the Dabhol Power Plant in India. The Dabhol project is one of twelve(12) projects between ENRON and OPIC. The total of ENRON documents at OPIC are estimated to be two long rows of four drawer high file cabinets.

b6
b7C

[] provided the interviewing agents with the following items: a copy of OPIC's Annual Records Management Briefing, an inventory of 24 of the 38 boxes taken by [] and contact information for []

b6
b7C

- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 02/07/2002

On February 6, 2002, [REDACTED]

[REDACTED] of OVERSEAS PRIVATE INVESTMENT CORPORATION (OPIC), 1100 New York Avenue, N.W., Washington, D.C., phone: (202) 336-8410, was interviewed by representatives of the Federal Bureau of Investigation (FBI). Also present during the interview was [REDACTED]

[REDACTED] Deputy General Counsel for OPIC. The purpose of the interview was to discuss numerous boxes that were removed from OPIC that may contain ENRON documents. After providing the nature of the interview and the identity of the interviewing agents, [REDACTED] provided the following information:

The interviewing agents asked [REDACTED] and [REDACTED] to review ENRON documents that were obtained from a third party and advise if these are the missing documents from OPIC. During review, [REDACTED] advised that the papers appear to be confidential business information (specifically documents relating to DABHOL) and privileged documents.

During the search for the files of [REDACTED] [REDACTED] spoke with the following individuals: [REDACTED] former Legislative Assistant and current Office Manager; [REDACTED] Deputy General Counsel; [REDACTED] Central File Coordinator. [REDACTED] believes that some of the information should have been redacted before being released to the public similar to items provided under The Freedom Of Information Act (FOIA). [REDACTED] pointed out that the DABHOL Project was photocopied at a single standing and is an example of something that should not be released into the public domain in an unredacted form.

[REDACTED] emphasized that the project files are with the Staff-Attorneys and the personal files of [REDACTED] are the documents that are missing from OPIC. [REDACTED] was provided with three(3) zip drives by [REDACTED] and downloaded information from his hard drive and erased other files.

Investigation on 02/06/02 at Washington, D.C.

File # 196C-HO-59147-(cov)-15 Date dictated 02/07/02

by SA [REDACTED]
SA [REDACTED]

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

196C-HO-59147-60V-15

1960 - 40 - 59147

196C-HO-59147

Continuation of FD-302 of [REDACTED]

, On 02/05/02 , Page 2

policy [REDACTED] understanding of the policy is that making copies of documents is permissible so long as the confidentiality of the work is protected by the attorney. [REDACTED] also believes that many OPIC attorneys make copies of deals and contracts that are being worked on through OPIC. For any copy that [REDACTED] made prior to leaving OPIC, the original document would be either with the specific attorney or in the central file room at OPIC. The following is a list of OPIC staff-attorneys that worked on ENRON deals: [REDACTED] (worked on Brazil and Cuiaba deals); [REDACTED] (worked on the Dabhol Power Plant and is currently employed at Oriskany, Herrington and Sutcliffe, phone: [REDACTED] worked on a potential project in Turkey and is currently employed at J.P. Morgan in New York City); [REDACTED] (worked on the Power Plant project in Gaza).

b6
b7Cb6
b7C

During the course of negotiating contracts with ENRON, [REDACTED] met with the following ENRON associates: [REDACTED] Washington, D.C. government affairs representative; [REDACTED]

b6
b7C

Prior to leaving OPIC [REDACTED] did not make a copy of any of his computer files from his hard drive. While employed at OPIC, [REDACTED] utilized both a "shared drive" and his personal "H drive". [REDACTED] believes that the shared drive is still active at OPIC, while the H drive was deleted when he left the company.

b6
b7C[REDACTED]
[REDACTED] a Federal Grand Jury Subpoena [REDACTED]
[REDACTED]b3
b6
b7C